

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

04/24/20
04:59 PM

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code
Section 2827.1, and to Address Other Issues
Related to Net Energy Metering.

And Related Matter.

Rulemaking 14-07-002
(Filed July 10, 2014)

Application 16-07-015

**PETITION FOR MODIFICATION OF DECISION 18-06-027 BY GRID
ALTERNATIVES CONCERNING THE DISADVANTAGED COMMUNITIES
SINGLE FAMILY SOLAR HOMES CUSTOMER ELIGIBILITY THRESHOLDS
AND PROGRAM FUNDING**

Elise Hunter
Director, Policy & Regulatory Affairs
GRID Alternatives
1171 Ocean Ave, Suite 200
Oakland, CA 94608
Telephone: (510) 338-9546
Facsimile: (510) 225-2585
Email: ehunter@gridalternatives.org

Dated: April 24, 2020

Table of Contents

<u>Section</u>	<u>Page</u>
I. Introduction.....	1
II. General Background & Summary	3
III. Request for Leave Under Rule 16.4(d)	6
IV. Request to Modify Decision 18-06-027 to Expand the Geographic Eligibility for DAC-SASH to Align with the Commission’s Environmental and Social Justice Action Plan.....	11
V. Request to Modify Decision 18-06-027 to Adjust the DAC-SASH Income Threshold from CARE/FERA Eligibility to 80 Percent Area Median Income	28
VI. Request to Modify Decision 18-06-027 to Increase Annual Funding for the DAC-SASH Program from \$10 Million to \$20 Million, Effective in 2020.....	32
VII. Conclusion.....	46

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code
Section 2827.1, and to Address Other Issues
Related to Net Energy Metering.

And Related Matter.

Rulemaking 14-07-002
(Filed July 10, 2014)

Application 16-07-015

**PETITION FOR MODIFICATION OF DECISION 18-06-027 BY GRID
ALTERNATIVES CONCERNING THE DISADVANTAGED COMMUNITIES
SINGLE FAMILY SOLAR HOMES CUSTOMER ELIGIBILITY THRESHOLDS
AND PROGRAM FUNDING**

I. INTRODUCTION

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC, Commission), GRID Alternatives (GRID) files this Petition for Modification (PFM) for Decision 18-06-027, *Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities* (D.18-06-027), adopted on June 22, 2018, in Rulemaking 14-07-002/Application 16-07-015, *Order Instituting Rulemaking to Develop a Successor to Existing Net Energy Metering Tariffs Pursuant to Public Utilities Code Section 2827.1, and to Address Other Issues Related to Net Energy Metering*, (NEM Proceeding, R.14-07-002). D.18-06-027 created the Disadvantaged Communities Single Family Solar Homes (DAC-SASH) program, as well as two other programs to fulfill the directive in Assembly Bill (AB) 327 to design alternatives to promote the growth of solar in Disadvantaged Communities (DACs). The scope of this PFM solely covers the DAC-SASH program.

GRID Alternatives is the nation's largest nonprofit solar installer, and the Program Administrator (PA) of the DAC-SASH program since 2019 and the Single Family Affordable Solar Homes (SASH) program since 2008. GRID also serves as co-PA of the Solar on Multifamily Affordable Housing (SOMAH) program since 2018 and the PA of the Low-Income Weatherization Program (LIWP) for single-family solar since 2014. GRID Alternatives brings to this PFM a wealth of knowledge gained by ten-plus years of administering multiple low-income solar programs in California. Over the years, GRID has gained a strong sense of best practices and strategies for success in these programs. Indeed, in an independent third party review of the SASH program, customers, subcontractors and the Commission have reported high levels of satisfaction with GRID as PA.¹

GRID files this PFM because GRID has received considerable input and feedback from social and environmental justice communities that have expressed concerns that certain customer eligibility thresholds within the DAC-SASH program cause undue restrictions, and which GRID believes will cause the program to fail in some regions. Thus, the program requires several straightforward refinements in customer eligibility. In addition, the prerogative for DAC-SASH to serve high-needs communities identified by the Commission, the increase in fire danger throughout the state and resulting need for resilience solutions, and the recent economic downturn caused by the global pandemic COVID-19 are driving the need for increased funding in the program.

The SASH program, the original model for DAC-SASH,² has brought rooftop solar to more than nine thousand homes³ across California and counting, resulting in average energy burden reductions of more than 50 percent. With GRID's integrated model of marketing, outreach and education (ME&O), installation performed or managed by GRID, and the integration of workforce development and training, participating low-income families are not only receiving relief on their energy bills, but they gain knowledge of energy efficiency and renewable energy

¹ California Solar Initiative Biennial Evaluation Studies for the Single-Family Affordable Solar Homes (SASH) and Multifamily Affordable Solar Housing (MASH) Low-Income Programs, Market and Program Administrator Assessment, 2011-2013, p.xiii

² D.18-06-027, p.2, "The DAC-SASH Program, modeled after the Single-family Affordable Solar Homes (SASH) Program, will provide assistance in the form of up-front financial incentives towards the installation of solar generating systems on the homes of low-income homeowners"

³ California DG Stats, queried 3/27/20: <https://www.californiadgstats.ca.gov/downloads/>

and valuable training in the emerging clean energy economy. GRID would like to maintain its record of success within in the DAC-SASH program, and views the recommendations contained in this PFM as a critical path forward to do so. GRID thanks the Commission and stakeholders for their consideration of this PFM, and requests approval as soon as reasonably possible.

II. GENERAL BACKGROUND & SUMMARY

The Commission created the DAC-SASH program in June 2018 in D.18-06-027 along with two other programs: the Green Tariff Disadvantaged Communities (GTDAC) and the Community Solar Green Tariff (CSGT) programs. These three programs together were intended to fulfill the statutory requirement under AB 327 to “[e]nsure that the standard contract or tariff made available to eligible customer-generators ensures that customer-sited renewable distributed generation continues to grow sustainably and *include specific alternatives designed for growth among residential customers in disadvantaged communities.*”⁴

The GTDAC and CSGT programs allow for low-income customers in DACs to access community solar credits via a bill discount. Because community solar is not on the customer’s roof, those programs provide access to solar benefits for renters and for homeowners with non-solar-suitable roofs. The DAC-SASH program enables low-income homeowners in DACs to access low- or no- cost solar panels on their roofs with the use of up-front incentives as well as outreach, education and installation support from the statewide program administrator, and workforce development and training. The combined effect of these three programs is that low-income residents in DACs have increased access to the benefits of solar, regardless of their housing type.

The DAC-SASH program is funded at \$10 million per year from 2019 through 2030, or \$120 million total. The funding for DAC-SASH comes from the statewide greenhouse gas (GHG) auction revenues, and if there are not enough GHG auction revenues, then the program will be funded through customer rates.⁵ Out of the \$10 million per year total, \$8.5 million is allocated for incentives to low-income households in DACs, and \$1.5 million is allocated for administration, ME&O, and program evaluation. In January 2019, GRID Alternatives won a statewide competitive solicitation to administer the DAC-SASH program.

⁴ AB 327, Section 11(b)(1), October 2013, emphasis added

⁵ D.18-06-027, p.30

Many aspects of the DAC-SASH program were modeled after the SASH program. D.18-06-027 determined that “SASH provides a proven and successful model for expanding access to solar among low-income customers and for providing additional, non-energy benefits, such as job training,”⁶ and therefore, “[a]ll SASH program rules not specifically changed in this decision or Appendix A shall apply to the DAC-SASH program.”⁷ The SASH program originated in 2006 by California AB 2723 which directed 10% of California Solar Initiative funds be set aside for programs assisting low-income households in investor-owned utility (IOU) service territories.⁸ Assembly Bill 217 extended SASH to continue until December 31, 2021.⁹ Currently, the SASH program has incentive funds remaining in Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) territories, but all of the incentive funds have been encumbered in Pacific Gas and Electric (PG&E) territory. The DAC-SASH program is active in all three IOU territories. GRID has been the PA of the SASH program since the program launch in 2008, selected through a competitive solicitation.

There are two main departures from SASH to DAC-SASH. First, is that DAC-SASH has a specific geographic requirement in addition to an income requirement; DAC-SASH is available to low-income homeowners located in DACs, defined as the top 25% of the CalEnviroscreen (CES) census tracts, as well as the 22 census tracts in the highest five percent of CES’s Pollution Burden, but that do not have an overall CES score because of unreliable socioeconomic or health data.¹⁰ The SASH program does not have a specific geographic requirement.

Second is that the income threshold used for SASH is the Public Utilities (P.U.) Code 2852 definition of “lower income,” or 80 percent of area median income (AMI), where the home is also subject to resale restrictions and affordability covenants. The DAC-SASH program income threshold is eligibility for the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs, which are tied to the Federal Poverty Level,¹¹ and not AMI.

⁶ D.18-06-027, p.28

⁷ *Ibid.*, p.30

⁸ GRID Alternatives. *About SASH*. <https://gridalternatives.org/what-we-do/program-administration/sash>

⁹ AB 217 (2013-14 Legislative Cycle).

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB217

¹⁰ D.18-06-027, p.16

¹¹ The CARE income requirement is 200% of the Federal Poverty Level starting at a household of one, and the FERA income requirement is 250% of the Federal Poverty Level, but starts at a household of three: <https://www.cpuc.ca.gov/General.aspx?id=976> For the purposes of the analyses in this PFM, GRID

As GRID has been preparing the launch the DAC-SASH program, GRID has identified several aspects of the DAC-SASH program that are unworkable, which will cause the program to fail in certain regions. In addition, three new factors have emerged since the creation of the DAC-SASH program: 1) The Commission formed its Environmental and Social Justice Action Plan (ESJ Action Plan) in February 2019, based on the expert guidance of the Disadvantaged Communities Advisory Group (DACAG), providing specific definitions and recommendations for ‘ESJ Communities;’ 2) The fall of 2019 marked the worst wildfire season in the state’s history, which launched an unprecedented energy storage equity program with a direct pathway for pairing with DAC-SASH-incented solar; and 3) the global pandemic COVID-19 began in early 2020, causing economic downturn that will disproportionately impact low-income households, driving the need for bill reduction solutions such as DAC-SASH.

In response to these factors, GRID files this PFM, summarized below:

1. Change the geographic threshold for DAC-SASH to include tribes and low-income census tracts

- Aligns with the Commission’s ESJ Action Plan and the recommendations in the DACAG’s Equity Framework
- Increases likelihood of success in the SDG&E region
- Enhances equity for rural communities and tribes
- Increases geographic overlap with the Self Generation Incentive Program (SGIP) Equity Programs
- Aligns with statewide equity goals laid out in Senate Bill (SB) 535 and AB 1550
- Upholds the DAC-SASH programmatic requirement to serve DACs under AB 327

2. Change the income threshold for DAC-SASH to be 80 percent of area median income instead of CARE/FERA eligibility

- Equitably includes low-income households in high cost-of-living areas
- Is grounded in statute: Public Utilities Code 2852
- Matches the income threshold for the SGIP Equity Programs for energy storage

3. Double the annual budget for DAC-SASH to \$20 million per year, beginning in 2020

- Ensures that priority communities – San Joaquin Valley proceeding communities, AB 617 communities, and high-disconnection communities – will be adequately served by DAC-SASH
- Increases the volume of eligible households that can leverage both DAC-SASH and the SGIP Equity programs, which will result in more solar and storage installations for customers in greatest need of resilience

uses 200% of the FPL as a proxy for the current income threshold of DAC-SASH, due to the fact that FERA does not apply to small households.

- Places more resources into a program that will provide economic relief to low-income households in the face of unprecedented economic downturn caused by COVID-19
- Strong likelihood that the doubling of the DAC-SASH budget can be accommodated by greenhouse gas (GHG) auction revenues dedicated for energy efficiency and clean energy projects

GRID requests that the revisions to the geographic eligibility and income threshold be made effective as expeditiously as possible after the approval of this PFM. GRID will file a Tier 2 Advice Letter within 30 days of the PFM approval implementing changes to the geographic eligibility and income threshold. GRID requests that the increased budget for DAC-SASH become effective on January 1, 2020, and be implemented in the next IOU funding cycle that collects DAC-SASH funds after this PFM is approved.

III. REQUEST FOR LEAVE UNDER RULE 16.4(d)

Per Rule 16.4(d) of the Commission's Rules of Practice and Procedure, GRID requests leave to file this PFM more than one year after D.18-06-027 was voted out by the Commission.

The lengthy timeline needed to select and approve the PA and to launch the program, in addition to two driving factors that occurred more than one year after D.18-06-027 -the SGIP Equity Programs and the COVID-19 crisis-, meant that GRID could not have issued this informed PFM within one year of the D.18-06-027. GRID notes that it won the bid to administer DAC-SASH in January 2019, but was not contracted and authorized to do paid work for DAC-SASH until April of 2019. GRID then spent the next several months engaging with stakeholders and preparing the DAC-SASH Program Implementation Plan (PIP), approved September of 2019, and the DAC-SASH ME&O Plan, approved December of 2019. The in-depth operational data included in this PFM emerged as a result of analysis GRID conducted to support the PIP and the ME&O plan, and thus was not ready to be filed by June 2019, or one year after D.18-06-027 was passed. To wit, the Commission encouraged GRID to include 'high needs communities' in the DAC-SASH ME&O plan, guidance which occurred more than one year after D.18-06-027 was passed. The guidance to serve 'high needs communities,' outlined in greater detail in Section VI, is one of the driving factors for why GRID is requesting an increased DAC-SASH budget.

In preparation for and following the program launch, GRID and its partners have been conducting an in-depth analysis of the limitations of the customer eligibility thresholds of DAC-SASH. The results of our ongoing analysis have corroborated GRID's prior advocacy that the

DAC-SASH program would fail in SDG&E. In this PFM in Section IV, GRID provides a detailed explanation of how the limited number of eligible homes in SDG&E will result in anemic adoption given typical customer conversion rates, meaning that only a fraction of allocated DAC-SASH funds will be spent in that region, leading to a buildup of unspent funds. This means that the scale of DAC-SASH adoption intended by the Commission will not be met in the SDG&E region, and much fewer families will receive critical energy burden reductions than intended by the Commission; in other words, the program will fail. GRID sees a strong need for this modification, and requests these changes near the launch of the program, in its first full operational year, to have maximum possible impact over the life of the program, scheduled to sunset in 2030.

In addition, GRID is driven to broaden eligibility and increase funding for DAC-SASH by modifying D.18-06-027 at this juncture because recent wildfire and power shutoff events and resulting regulatory initiatives are contemplating DAC-SASH as part of a suite of solutions to provide enhanced resilience to vulnerable customers. Twenty-nineteen was the worst wildfire season in history. From September 2019 through January 2020, the Commission increased funding for the SGIP Equity Budget for energy storage and has created an Equity Resiliency Budget to serve both low-income and medically vulnerable customers impacted by utility shutoffs and/or in High Fire Threat Districts (HFTD). These SGIP Equity programs are now funded at an unprecedented scale, totaling more than \$100 million per year until 2024. The Commission intends for DAC-SASH to be paired with storage incented under the SGIP Equity programs, as evidenced by the Commission's decision that DAC-SASH and SASH customers are automatically eligible for the SGIP Equity programs, without additional customer verification.¹² However, DAC-SASH is both geographically constrained in that the top 25% CES census tract DACs have very little overlap with HFTD, and the funding for DAC-SASH is less than one tenth of the funding for the SGIP Equity programs. Since the Commission has taken bold regulatory actions to address the resiliency needs of customers via solar and storage starting more than one year after D.18-06-027 was passed, it would have been impossible to know the specifics of those actions within one year of D.18-06-027. GRID is hearing from frontline communities across the state that do qualify for the SGIP Equity programs but are currently shut out of the DAC-SASH eligible locations that they are in need of clean, resilient solutions in the

¹² D.19-09-027, September 12, 2019, p.14

form of solar and storage to mitigate and adapt to the climate change impacts affecting them, namely wildfires, shutoffs, and extreme temperatures. Without the ability to leverage both DAC-SASH and the SGIP Equity programs to remove financial barriers to solar and storage, low-income customers will not be able to access these technologies. Now is an appropriate time to modify DAC-SASH to broaden it in a manner that will have a co-benefit of enabling streamlining with the SGIP Equity programs.

As of this filing, the country and the world are facing the unprecedented challenge of the COVID-19 pandemic. The World Health Organization (WHO) first reported on the emergence of COVID-19 at the end of December 2019,¹³ more than a year past when DAC-SASH was created. Since then, the COVID-19 disease has spread beyond its country of origin to countries all over the world, including the U.S. Under the Executive Order issued by California Governor Newsom in response to COVID-19, all Californians must now shelter in place at home until further notice.¹⁴ California will lose an estimated 600,000 jobs in the private sector alone as a result of the economic downturn caused by COVID-19 and the public health orders needed to slow the virus spread.¹⁵ Low-income customers will be impacted most severely by these economic uncertainties. Human Rights Watch recently predicted that low-income populations are more vulnerable both to the spread of the virus itself, as well as to harmful downstream economic impacts such as foreclosures and evictions.¹⁶

In light of the potential lasting economic losses facing low-income families due to COVID-19, existing programs such as DAC-SASH that seek to reduce financial burden on these families, and forge pathways to jobs in the clean energy economy, should be upheld and expanded to make maximum impact.

For these reasons, GRID believes that now is the appropriate time to modify D.18-06-027 as outlined in the sections below, and asks for leave to modify this Decision more than one year after the effective Decision date, per Rule 16.4(d).

¹³ World Health Organization Rolling Updates on the Coronavirus Disease:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/events-as-they-happen>

¹⁴ California Coronavirus (COVID-19) Response <https://covid19.ca.gov/stay-home-except-for-essential-needs/>

¹⁵ The Sacramento Bee. *Worried About Layoffs? This Map Shows Which California Communities Face the Biggest Job Losses*. March 23, 2020.

<https://www.sacbee.com/news/coronavirus/article241356656.html>

¹⁶ “US: Address Impact of Covid-19 on Poor. Virus Outbreak Highlights Structural Inequalities.” Human Right Watch, March 19, 2020. www.hrw.org/news/2020/03/19/us-address-impact-covid-19-poor

GRID Alternatives as the PA is the appropriate entity to file this PFM. Since DAC-SASH is a vertically integrated program similar to SASH where GRID's role as PA covers administering and disbursing funds, marketing to and educating potential clients, and installing technologies directly, GRID has the most understanding of the on-the-ground challenges faced by this program and is directly invested in the program's success. Due in part to GRID's decade-plus history of serving as the PA of the SASH program, GRID is engaged with stakeholders across the state with a keen interest in increasing access to affordable energy within their communities. In this PFM, GRID represents the interests of those diverse stakeholders, including tribes, cities, community-based organizations (CBOs), and homeowners who are currently excluded from the DAC-SASH program. As of the date of this filing, GRID includes and attaches to this PFM support letters from 14 tribes, nine cities and local governments, 16 advocacy and low-income housing groups representing communities across the state, and seven SASH participants and DAC-SASH program applicants.

In filing this PFM, GRID follows precedent set by its own experience influencing SASH budgets and other program aspects as the SASH PA, and by other PAs that have filed PFMs for programs they administer, with the aim of making the program more workable for current or future participants. Assembly Bill 217 had extended the SASH program and the Multifamily Affordable Solar Housing (MASH) programs in October of 2013, when GRID had already been in the PA role for SASH since 2008. When the Commission took up the design and implementation of the SASH extension ("SASH 2.0") GRID intervened to opine on a number of program design aspects of SASH 2.0.¹⁷ Ultimately, the Commission adopted GRID's recommendations to 1) extend the then-current PA contract for SASH without a competitive solicitation, 2) adopt job training requirements, 3) set capacity targets, 4) establish the incentive structure for the program, and 5) allow a novel third-party ownership model in SASH, with the specific consumer protection requirements GRID recommended.¹⁸ The Commission also upheld

¹⁷ Comments and Reply Comments of GRID Alternatives Regarding the Staff Proposal for Assembly Bill 217 Implementation, July 2, July 11 and August 1, 2014, respectively, in Rulemaking 12-11-005; Comments and Reply Comments of GRID Alternatives on the Proposed Decision extending the Multifamily Affordable Solar Housing and Single Family Affordable Solar Homes Programs within the California Solar Initiative, January 5 and January 12, 2015, respectively, in Rulemaking 12-11-005.

¹⁸ Decision 15-01-027 extending the Multifamily Affordable Solar Housing and Single Family Affordable Solar Homes Programs within the California Solar Initiative, p.12, p.26, 21, 47, 49-50, January 30, 2015, in Rulemaking 12-11-005

a Staff Proposal recommendation to split the AB 217 funds evenly between MASH and SASH, a recommendation that GRID and several parties supported and several other parties opposed.¹⁹ The joint PAs of the SGIP program have been intervening as parties in that rulemaking for nearly a decade on budgetary and program design aspects, influencing Commission decisions with their on-the-ground experience. In a Decision implementing the direction of Senate Bill 861, the Commission directed the IOUs (the then-SGIP PAs) to collect the maximum SGIP budget authorized in that bill, \$83 million, noting that all but one SGIP PA supported this collection level.²⁰ The Joint PAs of the SGIP program also file PFMs in response to stakeholder feedback. As an example, the joint SGIP PAs filed a PFM in September of 2019 to seek relief to remove the application fee for residential projects and to remove the requirement to submit a hard copy of the Energy Efficiency Audit (EEA).²¹ The purpose of that SGIP PA PFM generally was to “remove certain SGIP requirements that no longer serve a necessary purpose and/or can be modified so as not to impede the efficiency and effectiveness of the application process for both the PAs and program participants alike,” and the PAs cite active parties and stakeholders guiding their advocacy.²² The Commission accepted and adopted that PFM in a Decision on February 16, 2020.²³ Similarly, GRID Alternatives, as PA of the DAC-SASH program, files this timely PFM on behalf of affected stakeholders and end-users to make aspects of the DAC-SASH program more workable and accessible to communities in need throughout the state. These examples demonstrate that PAs bring unique and experienced perspectives to influence future iterations of the programs they administer, including matters affecting incentives and budgets.

¹⁹ *Ibid.*

²⁰ Decision Authorizing Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company to Continue to Collect Funds for the Self Generation Incentive Program Pursuant to Public Utilities Code Section 379.6 as Amended by Senate Bill 861, p.5, December 23, 2014, in Rulemaking 12-11-005

²¹ Joint Petition for Modification of Decisions 11-09-015 and 16-06-055 by Southern California Gas Company (U 904 G), Pacific Gas and Electric Company (U 39 E), Southern California Edison Company (U 338 E), and the Center for Sustainable Energy Concerning Self-Generation Incentive Program Application Requirements, September 17, 2019

²² *Ibid.* p.3

²³ D.20-02-002, February 16, 2020

IV. REQUEST TO MODIFY DECISION 18-06-027 TO EXPAND THE GEOGRAPHIC ELIGIBILITY FOR DAC-SASH TO ALIGN WITH THE COMMISSION'S ENVIRONMENTAL AND SOCIAL JUSTICE ACTION PLAN

A. Background

In D.18-06-027, the CPUC adopted a DAC definition of the top 25 percent CES census tracts statewide, as well as the 22 census tracts in the highest five percent of CES's Pollution Burden, but that do not have an overall CES score because of unreliable socioeconomic or health data.²⁴ This DAC definition was adopted for the DAC-SASH program as well as for the GTDAC and CSGT programs.

The Commission's rationale for selecting the aforementioned DAC definition was for simplicity, as well as alignment with the DAC definition used in the SOMAH program, which the Commission had created in D.17-12-022 approximately six months prior to creating the DAC-SASH, GTDAC and CSGT programs. The Commission noted that this definition also aligns with the California Health and Safety Code Section 39711.²⁵

In this PFM, GRID only seeks to change the customer eligibility as it applies to the DAC-SASH program, and does not seek to change the definition of DACs adopted in this Decision, the definition of DACs used in the other programs adopted in this Decision, or definition(s) of DACs adopted in any other Commission-led programs. GRID intends for the DAC-SASH program to maintain its ability to serve low-income homeowners in DACs defined as the statewide top 25 percent census tracts as measured by the CES tool and the top five percent of census tracts with the highest pollution burden, and is seeking to expand program eligibility to other targeted communities in need of affordable clean energy.

This approach is similar to the approach the Commission took in creating the Community Solar Green Tariff (CSGT), also authorized in D.18-06-027, which is available to top 25 percent CES census tract DACs and to San Joaquin Valley pilot program customers not located in a top 25 percent CES census tract DAC.²⁶ The CSGT program is one of the three programs fulfilling the specific DAC requirement in AB 327, but the Commission found it appropriate to also make the CSGT program available to San Joaquin Valley pilot communities with specific needs around

²⁴ D.18-06-027, p.16

²⁵ *Ibid.*

²⁶ D.18-06-027, p.68

fuel-switching that do not fall into a top 25 percent CES census tract DAC or the five percent of census tracts with the highest pollution burden. Similarly, GRID views DAC-SASH as continuing to fulfill the AB 327 requirement for solar growth in DACs, and seeks to include additional targeted communities with strong needs for affordable clean energy, not necessarily included in top 25 percent CES census tract DACs or the five percent of census tracts with the highest pollution burden.

The CES tool was originally created by the California Office of Environmental Health and Hazard Assessment (OEHHA) and the California Environmental Protection Agency (CalEPA) with the purpose of “help[ing] identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution’s effects.”²⁷ The CES tool takes a statewide lens in assessing burdens of pollution and other socioeconomic factors, and includes IOU territories as well as territories of municipal utilities. More than half of the population of the top 25 percent statewide CES census tracts fall into municipal utility territories (MOUs). By contrast, the DAC-SASH program is only available to customers in the IOU territories.²⁸ The CES tool applied on a statewide basis covers many MOU regions where DAC-SASH cannot be used, and has limited the potential of DAC-SASH to reach frontline communities in need of affordable clean energy. While GRID is not seeking to change the Decision’s DAC definition, the fact that this measurement includes many MOU territories illustrates the need for an expansion of customer eligibility within DAC-SASH.

Since the passage of D.18-06-027, the Commission has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan) intended to, among other goals, “[c]onsistently integrate equity and access considerations throughout CPUC proceedings and other efforts...and [i]ncrease climate resiliency in ESJ communities.”²⁹ In this ESJ Action Plan, the Commission then frames ESJ communities as those that are:

- predominantly communities of color or low-income;
- underrepresented in the policy setting or decision-making process;
- subject to a disproportionate impact from one or more environmental hazards; and

²⁷ <https://oehha.ca.gov/calenviroscreen/about-calenviroscreen>, queried 1/24/20

²⁸ Includes customers within CCAs but not customers within municipal utilities.

²⁹ Final ESJ Action Plan, Goals 1 and 4, February 2019, p.7-8

- likely to experience disparate implementation of environmental regulations and socio-economic

And that these ESJ communities includes but are not limited to the following definition:

- Disadvantaged Communities located in the top 25% of communities identified by Cal EPA’s CalEnviroScreen
- all Tribal lands;
- low-income households, defined as households with 80% AMI or below, and;
- low-income census tracts, defined as census tracts with household incomes less than 80 percent area or state median income³⁰

In creating the ESJ Plan, the Commission acknowledges its role in “approv[ing] programs and policies that directly impact the access of Environmental Justice and Social Justice (ESJ) communities to affordable clean energy...”³¹ These definitions originated in the Disadvantaged Communities Advisory Group’s Equity Framework which informed and was referenced in the Commission’s ESJ Plan. While the Commission does make a distinction between the definition of ESJ communities for “broader efforts” and the term “disadvantaged communities” or ‘DACs’ as terms specifically defined in statute and CPUC decisions,”³² GRID posits that DAC-SASH, as a mechanism to provide clean, affordable energy to communities that have historically faced barriers, would be most powerful and impactful if it were available to ESJ communities as a whole, which include the top 25% statewide CES census tract DACs as originally put forth in D.18-06-027, but also available to other targeted communities in need of affordable clean energy.

The Commission’s definition of ESJ communities originated in a September 2018 recommendation made by the Disadvantaged Communities Advisory Group (DACAG), consisting of “representatives of disadvantaged communities who will provide advice on state programs proposed to achieve clean energy and pollution reduction”³³ to the Commission and California Energy Commission (CEC). GRID is following the intention of the DACAG by

³⁰ *Ibid.*, p.9-10, footnotes placed in main text

³¹ *Ibid.*

³² *Ibid.*, p.7-8

³³ DACAG press release, May 2018,

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M211/K882/211882742.PDF>

proposing to broaden the communities eligible for DAC-SASH to include tribes and low-income census tracts in addition to the top 25% CES census tract DACs measured on a statewide basis.

B. Justification for Relief Requested

GRID is petitioning for the geographic eligibility of DAC-SASH to be broadened from the top 25% statewide CES tracts and the 22 census tracts in the highest 5 percent of the CES Pollution Burden to encompass the ESJ communities as described in the Commission's ESJ plan:

- Disadvantaged Communities located in the top 25% of CES communities and the 22 census tracts in the highest 5 percent of the CES Pollution Burden (already served by DAC-SASH);
- all Tribal lands;
- low-income census tracts: census tracts with median incomes at or below 80 percent of median income, or the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093³⁴

In other words, GRID is proposing to add Tribes as well as low-income census tracts to the eligible geographies in DAC-SASH.

i. Rationale for the inclusion of tribes

GRID proposes to add tribes as a standalone category in communities eligible for DAC-SASH. Census tracts are used as the geographic determinant by the CES tool, but census tracts do not generally align with the populations of tribal nations. To illustrate, census tracts range in population from a minimum of 1,200 individuals to a maximum of 8,000 individuals per census tract, with the average being 4,000 individuals.³⁵ Tribes in California range in size from five members to 5,000 members, with most tribes significantly smaller than the average census tract

³⁴ GRID does not include "low-income households" in this list as the ESJ action plan does, because DAC-SASH is inherently a low-income program. GRID addresses the income threshold in Section V. GRID includes the full statutory definition of low-income census tracts used in AB 1550 here.

³⁵ <https://www2.census.gov/geo/pdfs/education/CensusTracts.pdf>

population.³⁶ As an example, the Bishop Paiute tribe is the fifth largest in California with a population of approximately 2,000 members.³⁷ The tribe has experienced broad environmental degradation of its tribal homeland including the exportation of surface and groundwater which has restricted availability of water for irrigation, and caused the Owens Dry Lake to become one of the largest sources of anthropogenic caused dust (PM-10) pollution in the world. The tribe has experienced the associated negative socioeconomic and health impacts from the environmental degradation, and also is suffering from an unemployment rate of more than 30 percent with over 80 percent of the tribe below the Department of Housing and Urban Development (HUD) low-income guidelines.³⁸ However, the tribe is located in a census tract of nearly 6,000 individuals, and receives a CES score for the overall census tract which also houses several resort ski communities, and individuals who have not been as impacted by the environmental conditions as tribal members. As a result of this geographic misalignment with census tracts and tribal nations, tribes across California are categorically excluded from DAC-SASH. As shown in the illustrative maps in Appendix 4, no tribes in California are currently included in the top 25% CES census tract DAC map. California has 109 federally-recognized tribes, with another 79 petitioning for federal recognition, and the highest population of individuals of Native American descent of any state in the US.³⁹ GRID and a large number of tribal stakeholders view this outcome as inequitable; tribes face myriad environmental and social justice issues, and should be included as their own category in DAC-SASH and other equity programs.

In creating the SGIP Equity Resilience Budget for energy storage, the Commission expanded the Equity Budget eligibility (and in doing so, the Equity Resilience Budget) to include homes within Indian Country because “such communities do not qualify as ‘disadvantaged communities’ identified by CalEnviroScreen, pursuant to Health and Safety Code section 39711 and D.17-10-004. The primary reason for this is that most of the lands defined as Indian Country are located in remote areas with low levels of industrial pollution and vehicle emissions. However, because of their remoteness, these lands frequently experience poor electric service

³⁶ [https://www.census.gov/population/www/cen2010/cph-t/t-6tables/TABLE%20\(19\).pdf](https://www.census.gov/population/www/cen2010/cph-t/t-6tables/TABLE%20(19).pdf) notes 352,000 tribal members and 109 federally-recognized tribes with 78 additional petitioning for recognition. <https://www.courts.ca.gov/3066.htm>.

³⁷ <http://www.bishoppaiutetribes.com/>

³⁸ Reported by Bisop Pauite Tribal Environmental Directors’s office, information documented in ex parte meeting notice filed by GRID to service list in R.14-07-002 on May 11, 2018.

³⁹ <https://www.courts.ca.gov/3066.htm>

reliability. They have also suffered from historic neglect.”⁴⁰ GRID notes that there are 77 known tribes in California that fall fully or partially in the HFTD, the publicly known⁴¹ geographic threshold for the SGIP ERB. This means that if tribes are included in DAC-SASH as proposed, the low-income populations of 77 tribes across the state will be able to access no-cost solar and storage to provide resilience in the face of climate change impacts. GRID includes support letters for this inclusion of tribes in DAC-SASH from 14 Tribal nations and organizations based in CA in Appendix 5.

ii. Rationale for the inclusion of low-income census tracts

a) Alignment with statewide equity goals

GRID proposes that low-income census tracts designated as tracts where the median household income is less than 80 percent of AMI or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093, be included in DAC-SASH. In 2012, SB 535 directed the legislature to appropriate one quarter of GHG auction revenues to DACs. This appropriation was amended in 2016 by AB 1550, which directed the legislature to appropriate an additional ten percent of GHG auction revenues to low-income communities, defined in statute as census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093.⁴² By allowing the DAC-SASH program to be eligible to both CES census tracts and low-income census tracts, the program helps meet the intention and requirements of both SB 535 and AB 1550.

b) Equity for rural communities

Adding low-income census tracts to the DAC-SASH program broadens the program to many rural communities that are currently left out of the program. The current top 25% CES statewide

⁴⁰ D.19-09-027, p.12, September 12, 2019

⁴¹ While the SGIP Equity Resiliency Budget also includes households that have been shut off twice in a PSPS event, there is no public data on currently on households that have been shut off twice. Thus, GRID does not include PSPS in this analysis.

⁴² AB 1550, Section 1(d)(2)

census tract DAC definition concentrates program eligibility in areas with the highest urban and agricultural pollution. However, many low-income rural communities in need of affordable clean energy cannot access the program. Broad examples of these low-income rural communities currently left out of the DAC-SASH program are the Sierra Foothills, large swaths of the North Coast including Sonoma, Mendocino, and Humboldt Counties, and the inland Central Coast area near Monterey and Salinas. For more information, please see the map of low-income census tracts in addition to the top 25% statewide CES DACs in Appendix 4.

c) Ensures program success in the SDG&E region

The inclusion of low-income census tracts as eligible regions for DAC-SASH increases the area in the SDG&E territory that DAC-SASH can serve. This is critical, because currently the top 25% statewide census tract requirement covers so few census tracts in SDG&E territory that GRID predicts the program will fail in SDG&E.

When there are not enough eligible homes within a region, the program will ultimately fail, and it is unwise and inequitable to wait for this outcome before acting to change the program. While independent program measurement and evaluation processes can be a natural place to transparently evaluate the need for a program change, GRID notes that the DAC-SASH evaluation process will occur every three years starting in 2021,⁴³ meaning that the solicitation for the program evaluator for the first evaluation cycle will likely not start until late 2021, in order to allow for three years of program operation (2019-2021). Since evaluations of these program types can take more than a year to complete,⁴⁴ it is likely that the earliest the Commission and stakeholders will have the evaluation report is late 2022, and the soonest the evaluator's recommended modifications could be implemented is early 2023, a full three years from the date of this PFM. Waiting several years from now before resolving a clearly demonstrated issue with program design in one of the IOUs will inequitably leave low-income families in SDG&E without this critical mechanism to reduce their energy burdens.

⁴³ D.18-06-027, p.38

⁴⁴ In the most recent SASH (and MASH) program evaluation cycle, the introductory meeting between the third-party program evaluator (which had been selected in an earlier competitive RFP process), the CPUC ED, and the PAs occurred in May 2014. The evaluation considered program years 2011-2013, and the final reports were issued in January 2016. <https://www.cpuc.ca.gov/General.aspx?id=3043>

Further, GRID can attest from its experience administering the single-family solar installations of the Low-Income Weatherization Program (LIWP-SF) that SDG&E's low-income, owner-occupied housing stock in the top 25 percent CES census tract DACs will be insufficient to utilize the program funds and provide meaningful relief to low-income households in that IOU territory. In addition to GRID's comments already in this docket that low-income solar program only available to the top 25 percent CES census tract DACs will not succeed in SDG&E,⁴⁵ GRID provides more corroborating detail here: GRID administered the \$38.2 million LIWP-SF Solar program on behalf of the California Department of Community Services and Development (CSD) statewide from 2015-2016, and in Region 3 (Central Valley) from 2016-2017. In 2017-2018 GRID also served as a subcontractor for this program to help administrators in other regions, including SDG&E, meet their participation goals.⁴⁶ Because of GRID's extensive experience identifying low-income homeowners in CES census tract DACs for solar installations, dating back five years, GRID is deeply familiar with the fact that SDG&E has an extremely limited percentage of its territory that are CES DACs, and an anemic supply of low-income single-family homes in those census tracts. Within the timeframe of GRID's LIWP program administration, GRID installed solar for 3,560 single-family low-income households across the state under the LIWP-SF program. Only 46 projects were installed in SDG&E's service territory, verses 1,420 in SCE and 1,178 in PG&E. In the San Diego region, 112 projects were installed in Imperial Irrigation District, reflecting the higher percentage of census tracts that are CES DACs in that municipal utility district rather than in SDG&E.⁴⁷ GRID utilizes this LIWP-SF program example to demonstrate its experience administering programs that are CES DAC programs, and specific to SDG&E's service territory, beyond DAC-SASH. This experience informs our determination that there simply are not enough DAC-SASH eligible households in the SDG&E territory for DAC-SASH to succeed. There are currently only 38 census tracts and 3,506 estimated low-income households in SDG&E that can access DAC-

⁴⁵Proposal of GRID Alternatives for a Net Energy Metering Successor Tariff for Disadvantaged Communities, p.10, August 10, 2015

⁴⁶ https://www.csd.ca.gov/Shared%20Documents/LIWP_Supplemental_Report-Item_4700-101-0001_12.2019.pdf.

⁴⁷ GRID's Salesforce database, data accessed 4/3/2020. Project data publicly reported at <https://webmaps.arb.ca.gov/ccimap/>.

SASH over ten years. The percentage of homes that may install solar, or *market potential*, is much less than the total potential of homes, for several reasons:

- Owner occupancy: In order to be eligible for DAC-SASH, the home must be occupied by its homeowner. While GRID can easily identify single-family homes, many of these homes must drop out of the DAC-SASH application because they are inhabited by renters.
- Attached/detached home: Many attached homes, while single-family and owner-occupied, are often part of a condo dwelling in which the roof space is owned by a Homeowner's Association (HOA) and has complications or obstacles for the individual homeowner to utilize it to install solar on a single unit.
- Solar unsuitability: GRID has found in the market of low-income qualifying homes that a significant portion will not be solar suitable, due to roof condition, electrical system, unpermitted structures on the property, and/or other code or structural issues that are cost-prohibitive for the homeowner to remedy and that cannot be financed with program funds or GRID's philanthropic resources. GRID's experience is corroborated by the CEC's Low-income Barriers Report (Barriers Report).⁴⁸ For example, GRID's database indicates that for clients with an accepted SASH application from 2016-2018, on average only 65 percent continue with an installation,⁴⁹ typically due to the home not being solar suitable. In the Los Angeles region, only 35 percent of homes continue with the installation due to solar unsuitability.
- Trust barrier: GRID invests heavily in on-the-ground outreach and marketing, as well as partnerships with trusted community organizations to market the program. Trust is critical in communities that may view these programs as "scams" as the Barriers Report notes,⁵⁰ or as "too good to be true" as the most recent SASH program evaluation report corroborated.⁵¹ Based on GRID's past conversion rates, GRID estimates it needs at least

⁴⁸ Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities, California Energy Commission (CEC Low-Income Barriers Report), December 2016, p.34. Available at https://ww2.energy.ca.gov/sb350/barriers_report/

⁴⁹ DAC-SASH ME&O Plan, p.14, December 2020

⁵⁰ CEC Low-Income Barriers Report, p.40

⁵¹ SASH Market and Program Administrator Assessment, Program Year 2011-2013, p.53, available at: <https://www.cpuc.ca.gov/General.aspx?id=3043>

15 -20 qualified leads (depending on market location) to complete one project. This results in a low response rate to marketing efforts that would otherwise be more successful in the general market.

Thus, in order to be successful, GRID must rely on a large enough base of eligible customers in order to spend program incentives in any given year. The marketing and outreach approach in DAC-SASH (and SASH) is different than any other Commission-sanctioned solar/renewables program GRID is aware of, including MASH, SOMAH, SGIP, and the California Solar Initiative (CSI) general market program. In other programs, demand is typically discernible by assessing uptake and interest when the program opens. For example, the fact that both MASH and SOMAH have “sold out” or reserved all available incentives for the year on the day the program opens indicates a strong demand by the general public for the program, as a result of marketing by multiple contractors, and the fact that general market actors have the ability to bring their own capital to the project.

GRID markets SASH and DAC-SASH using a recognized brand, data-driven targeting, community and institutional partnerships, and experience-based and flexible marketing and outreach activities. In contrast to the programs mentioned above, there is very little client acquisition that happens without the PA’s efforts. As such, having incentives not “sold out” on day one of the program opening does not indicate a lack of demand, but rather, that the target market has not yet received education and awareness about the program.

Most clients who sign up for SASH or DAC-SASH do not hear about the program on the radio, or internet, or television. Clients receive information from GRID, its trusted network of partners, or they receive information from a friend or neighbor who has previously participated. Most are unaware of solar technology, and how it works, and/or think that solar is not a solution for reducing energy burden that is accessible to them. GRID invests tremendous time and efforts in homeowner education and awareness of the technology, DAC-SASH program, and complementary programs (i.e. CARE, ESAP) that they may be eligible for. In fact, the majority of clients GRID serves have not signed up for CARE or ESAP even though they are eligible, reflecting a probable lack of awareness or trust of these programs.

Because the SASH and DAC-SASH programs are structured so differently in terms of ME&O than other programs, the size of the eligible population also should be considered differently. The

changes GRID proposes in this PFM are estimated to create a total eligible pool of more than 500,000 homes. At first pass, this pool may seem too large. However, GRID believes this is appropriate, and necessary, given the low customer conversion rates in part due to solar suitability that are unique to SASH/DAC-SASH.

The combination of the factors above results in a low estimated average project conversion rate of 6 percent. Although this percentage varies by region, GRID uses this percentage as a proxy statewide to arrive at the market potential of DAC-SASH installations in each IOU territory annually. In reality, the 6 percent conversion rate is artificial, and the actual is likely to be lower. In Appendix 3, GRID lays out a typical client acquisition ‘funnel’ for SASH and DAC-SASH clients. With each phase of outreach, qualification, and solar suitability analysis, a certain percentage of customers falls off. GRID uses 6 percent because it is the rounded equivalent of the average marketing response rate (9.5 percent) times the average solar suitability rate of homes (65 percent), assuming that all homes within these tables are already qualified. In practice, GRID has limited knowledge of which homes are qualified on an income basis to start, so there is in fact more client drop-off than simply the response rate multiplied by the solar suitability rate.

Each IOU has a certain number of annual DAC-SASH projects allocated to its territory, based on the funding contributed by that IOU to DAC-SASH. Ideally, the estimated market potential of projects based on the total potential of homes and conversation rates (column D in Tables 1-3) would either meet or exceed the number of projects funded per IOU (column C in Tables 1-3). In that way, GRID as the DAC-SASH PA would be able to spend all of its incentive funding on DAC-SASH project installations every year of the twelve-year program.

Unfortunately, GRID finds that with the current geographic thresholds, the total market potential of homes does not come close to meeting the number of funded projects in SDG&E. That means that GRID as the DAC-SASH PA cannot find enough homes in SDG&E to spend its annual project funding, and the DAC-SASH program will fail in that location.

GRID illustrates how the addition of AB 1550 low-income census tracts would impact the DAC-SASH program with Tables 1, 2 and 3 below:

Table 1: DAC-SASH Eligible Households and Projects Under Current Eligibility Rules⁵²

	A. # Total Census Tracts	B. 200% FPL Homes	C. Annual <i>Funded</i> Program Installations ⁵³	D. Annual <i>Market Potential</i> Program Installations ([B * 6%]/ 12)	E. Annual Shortfall (C-D)
PG&E	361	69,705	342	349	None
SCE	664	98,531	350	493	None
SDG&E	38	3,056	84	15	69
TOTAL	1,063	171,292	776	856	None

As Table 1 shows, there would be an annual shortfall in SDG&E territory of close to 70 projects, or more than 80 percent of the incentive budget, meaning that GRID will not be able to identify enough homeowners who qualify for the allocated funds. While there would be no shortfall in PG&E and SCE using the estimated conversion threshold of 6 percent, the margins are thin in these IOUs. Ideally, the market potential in each IOU would far exceed the number of funded projects, providing a cushion that will ensure that GRID can allocate all of the program funds even when any of the barriers outlined above are more pronounced in any given community. An inability of a PA to spend its allocated annual funds, due to restrictive customer eligibility thresholds, means that the program will fail to meet the Commission’s intended volume when that program was created. In the context of DAC-SASH, this means that far fewer low-income families in the SDG&E region will receive the energy burden reduction and career benefits of DAC-SASH than the Commission intended, and in this sense, the program will fail in the SDG&E region.

Adding low-income census tracts will result in a total of 260 census tracts and more than 26,000 households in SDG&E over ten years that can access the benefits of DAC-SASH. The inclusion of low-income census tracts will add enough potential households to make the overall project conversions work within the parameters of the available funding in that region. Table 2 shows the increase in eligible households and estimated program installations, per IOU, with low-

⁵² Source: DOE LEADS Tool. GRID includes a proxy for the current income threshold, 200% of FPL. While the DAC-SASH program does include FERA households of up to 250% of FPL, GRID uses 200% of FPL because FERA only applies to 3+ member households, and does not include smaller households.

⁵³ Based on the average system size of all GRID’s single-family installations in each IOU’s service territory in 2018 and 2019; and in kW, CEC-AC is 3.617kW in PG&E, 3.726kW in SCE, and 3.462kW in SDG&E; the \$8.5M in annual incentives is funded by each utility at: PG&E 43.7%; SCE 46%, SDG&E 10.3%.

income census tracts added to the program. When low-income census tracts are added to the geographic eligibility, the annual estimated program installations either meets or exceeds the annual funded program installations in every IOU territory. In other words, there is no shortfall in any IOU.

Table 2: DAC-SASH Eligible Households and Projects with Low-Income Census Tracts Included

	A. # Total Census Tracts	B. 200% FPL Homes	C. Annual <i>Funded</i> Program Installations	D. Annual <i>Market Potential</i> Program Installations ([B * 6%]/ 12)	E. Annual Shortfall (C-D)
PG&E	994	136,845	342	684	None
SCE	1,136	170,388	350	852	None
SDG&E	260	26,119	84	131	None
TOTAL	2,390	333,352	776	1,667	None

Because GRID is proposing both a geographic expansion and a new income threshold for DAC-SASH, GRID also includes Table 3, which combines geographic expansion (namely low-income census tracts) and the new income threshold that GRID outlines in Section VI. In these analyses, GRID does not include tribes, because there is not an accurate source of total tribal membership or homeownership that can be filtered by IOU territory, and tribes constitute a relatively small portion of the geographic expansion by population. Table 3 shows that including low-income census tracts and refining the income threshold as laid out in Section IV leaves a comfortable margin in all three IOU territories, ensuring program success in all regions.

Table 3: DAC-SASH Eligible Households and Projects with Low-Income Census Tracts Included and Income Threshold Modified to 80% of AMI

	A. # Total Census Tracts	B. 80% of AMI Homes	C. Annual <i>Funded</i> Program Installations	D. Annual <i>Market Potential</i> Program Installations ([B * 6%]/ 12)	E. Annual Shortfall (C-D)
PG&E	994	213,523	342	1,068	None
SCE	1,136	267,613	350	1,338	None
SDG&E	260	50,178	84	251	None
TOTAL	2,390	531,314	776	2,657	None

As demonstrated in the Tables 1, 2 and 3, the inclusion of low-income census tracts in DAC-SASH increases the total amount of eligible projects, and thus the estimated converted projects,

in all territories, but the impact is most profound in SDG&E. With this change, GRID foresees the ability to develop a robust portion of DAC-SASH projects across IOU territories, as intended by the Commission.

d) Alignment with the SGIP Equity programs

By including AB 1550 low-income census tracts and tribes into the DAC-SASH program, thousands more customers will qualify for both DAC-SASH and the SGIP Equity Resiliency Budget,⁵⁴ which will increase the number of low-income customers in wildfire threat areas who can access clean, safe, and resilient solutions powered by solar and storage.

As outlined earlier in this PFM, the Commission recently allocated the majority of 2020-2024 SGIP energy storage funds for equity purposes, with the highest residential incentives going towards low-income or medically vulnerable customers in HFTDs. Unfortunately, there is very little overlap between the top 25 percent statewide CES census tract DACs and the Tier 2 and 3 HFTD; in fact, only 14 DACs have an overlap of more than 50 percent with a Tier 2 or Tier 3 HFTD, and all of those census tracts are in SCE territory.⁵⁵ Notably, there is not a single census tract that fully falls into both a top 25 percent CES statewide DAC and a Tier 2 or Tier 3 HFTD. An estimate of low-income homes in those overlapped DACs using either the current program income threshold of 200 percent of FPL or 80 percent of AMI results in fewer than 3,000 eligible homes, which given the expected customer drop off, will not result in meaningful adoption.

As the DAC-SASH program stands today, GRID foresees close to zero new single-family residential solar-paired storage projects accessed by low-income customers in HFTD,⁵⁶ because of the lack of geographic overlap between DAC-SASH and the SGIP Equity Resiliency Budget. While these low-income HFTD customers could potentially still access the SGIP Equity

⁵⁴ There is overlap between DAC-SASH and the SGIP Equity Budget, since the SGIP Equity Budget has not geographic requirement. However, GRID focuses on the SGIP Equity Resiliency Budget because that program is more certain to fully cover the cost of a battery at \$1.00/Wh, and because the Equity Resiliency Budget is funded at more than ten times the amount of the SGIP Equity Budget.

⁵⁵ The DACs used for this analysis align with the CES 3.0 DAC map: “this map shows the disadvantaged communities designated by CalEPA for the purpose of SB 535. These areas represent the 25% highest scoring census tracts in CalEnviroScreen 3.0, along with other areas with high amounts of pollution and low populations.” <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

⁵⁶ GRID does not include PSPS customers in this narrative because as of the time of this filing, there is no reliable public information on which PSPS geographic regions qualify for the SGIP Equity Resilience Budget.

Resiliency Budget for storage, they would only qualify for incentivized standalone storage, which would need to be grid-charged well in advance of an outage and would only last for several hours depending on the storage device. Customers may not have enough time to charge their standalone storage devices, and the backup provided by one battery cycle may not be adequate to uphold all customer health and safety needs and/or ride through the outage. Pairing solar with storage enhances resiliency and is a superior solution to standalone storage, because customers can charge their storage devices with solar, even while the grid is down. The Commission corroborates the benefit of pairing DAC-SASH (and SASH) with the SGIP Equity programs: “[p]roviding the same incentive levels to equity budget customers in Tier 3 or Tier 2 HFTDs that also participate in the SASH or DAC-SASH programs increases the length of the resiliency benefits available to these customers during PSPS outages because correctly configured on-site solar generation can recharge on-site storage systems, potentially enabling the storage-plus-solar system to provide multi-day, multi-hour backup electricity for critical loads.”⁵⁷ GRID would like to meet the Commission’s stated intention for DAC-SASH to be paired with the SGIP Equity Resiliency Budget. GRID’s recommended geographic expansions for DAC-SASH will ensure that there is adequate geographic overlap between DAC-SASH and the Tier 2 and Tier 3 HFTD. The inclusion of low-income census tracts and tribes in DAC-SASH will bring in 77 tribes and 146 new census tracts with more than 50 percent overlap with Tier 2 or Tier 3 HFTD, spanning all three IOUs. GRID summarizes the overlap in eligibility of DAC-SASH and the SGIP Equity Resiliency Budget, with GRID’s geographic recommendations in Table 4 below:

Table 4: Estimated DAC-SASH/SGIP ERB Projects with Low-Income Census Tracts and Tribes Included in DAC-SASH

	# Tribes with > 50% overlap with T2 or T3 HFTD (no population data)	# AB 1550 Low-Income Census Tracts with > 50% overlap with T2 or T3 HFTD	Est. Low-Income Households with AB 1550 Expansion (200 % FPL)	Est. Low-Income Households with AB 1550 Expansion (80 % AMI)
PG&E	42	68	12,227	17,590
SCE	11	63	8,249	13,051
SDG&E	24	15	1,811	3,385
TOTAL	77	146	22,288	34,026

⁵⁷ D.19-09-027, September 12, 2019, p.36

Table 4 shows that the inclusion of low-income census tracts brings more overlap between the DAC-SASH program and Tier 2 and Tier 3 HFTD, the publicly known⁵⁸ geographic eligibility for the SGIP Equity Resiliency Budget. Using a proxy for the current income limit for the DAC-SASH program, there will be approximately 22,288 new homes that would be eligible for both DAC-SASH and the SGIP ERB.⁵⁹ The proposed new income threshold of 80% of AMI almost increases by more than 50 percent the amount of homes that will qualify for the SGIP ERB and DAC-SASH. These estimates are likely to be conservative because: 1) GRID cannot currently include PSPS households in this analysis due to lack of public data; and 2) the household-level analysis only takes into account the inclusion of low-income census tracts, and not tribes, because consistent tribal population data does not exist. GRID believes that the inclusion of low-income census tracts and tribes, paired with the new proposed income threshold will provide a robust enough overlap that SGIP ERB and DAC-SASH can be paired together across IOUs, as the Commission intended.

iii. Ensuring robust DAC participation

With these changes enacted, GRID will work to ensure a robust program adoption in the top 25 percent CES census tract DACs and the five percent of census tracts with the highest pollution burden. While not included in this filing, GRID is open to working with stakeholders to develop either a prioritization scheme or a quota of projects that occur within DACs.⁶⁰ In addition, GRID remains committed to focusing its job training efforts in DACs, including broad participation of Job Training Organizations located in DACs and the inclusion of DAC residents in the program's workforce development initiatives, as is detailed throughout its Task Order in the program administrative contract.

⁵⁸ While the SGIP Equity Resiliency Budget also includes households that have been shut off twice in a PSPS event, there is no public data on currently on households that have been shut off twice. Thus, GRID does not include PSPS in this analysis.

⁵⁹ To arrive at this estimate, GRID used ArcGIS software to find low-income census tracts that had a greater than 50 percent overlap with Tier 2 and Tier 3 HFTDs. GRID then found the number of low-income single family owner-occupied homes within those census tracts at both the 200% FPL and 80% AMI income guidelines using the DOE LEADS tool. Finally, GRID multiplied these low-income homes by the average percentage land overlap between the census tracts and the HFTDs, which is 86 percent.

⁶⁰ The mechanism to create such a scheme or quota would be through a Tier 2 Advice Letter rather than through this Petition for Modification.

C. Relief Requested

GRID requests that D.18-06-027 be modified so that the geographic eligibility include, in addition to top 25 percent statewide CES DACs and 22 census tracts with the highest five percent of the CES pollution burden, low-income census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low-income by the California HCD State Income Limits adopted pursuant to Section 50093, and include tribes. GRID requests that these changes be made as expeditiously as possible after the Commission's approval of this PFM, and GRID will issue a Tier 2 Advice Letter within 30 days of the PFM approval implementing these changes.

D. Redline changes to Decision 18-06-027 for Relief Requested

Text on page 3

“The DAC-SASH program will be available to low-income customers who are resident owners of single family homes in DACs, low-income census tracts,⁶¹ and tribes.”

Text on page 29

“Instead, we adopt a new program that is similar in structure to SASH, but is better targeted to residents of DACs and other communities of high need, and is not limited by the SASH statutory eligibility limits...”

“By creating a separate but similarly structured program, we are able to continue a SASH-like program targeted to DACs, low-income census tracts and tribes through 2030, comparable to the recently-adopted SOMAH program, which serves low-income multifamily affordable housing statewide and has special eligibility criteria for DACs.”

“For these reasons, we adopt a new Single-family Solar Homes program for DACs and other communities of high need, to be called the DACs – Single-family Solar Homes program (DAC-SASH).”

Text on page 30

“Low-income customers of PG&E, SCE, and SDG&E are eligible for DAC-SASH if they own and occupy single-family homes in DACs as defined in this Decision, low-income census tracts or tribes, and meet the income eligibility requirements of ~~CARE or FERA~~ at or below 80 percent of the statewide median income or with median household incomes at or below the threshold

⁶¹ Defined in AB 1550 Section 1(d)(2)

designated as low-income by the California Housing and Community Development's (HCD) State Income Limits adopted pursuant to Section 50093."

Finding of Fact 7, page 92

"7. Financial barriers, including the lack of capital for an initial down-payment or lack of access to credit pose a significant barrier to solar adoption for low-income households ~~in~~ including those in DACs."

Conclusion of Law 7, page 96

"7. It is reasonable to retain the structure and most program rules of the SASH program in a comparable program aimed at low-income single-family homeowners in DACs and other communities of high need."

Note: GRID includes a redlined Appendix A from D.18-06-027 in Appendix 1 of this filing, which takes into account all proposed changes in this filing.

V. REQUEST TO MODIFY DECISION 18-06-027 TO ADJUST THE DAC-SASH INCOME THRESHOLD FROM CARE/FERA ELIGIBILITY TO 80 PERCENT AREA MEDIAN INCOME

A. Background

Decision 18-06-027 originally set the income threshold for DAC-SASH to be same income eligibility threshold as the California Alternate Rates for Energy (CARE) and/or the Family Electric Rate Assistance Program (FERA). The CARE program is capped at 200 percent of the Federal Poverty Level, and the FERA program is capped at 250 percent of the Federal Poverty Level, for households of three or greater.⁶²

The SASH program, which has been operating successfully in California for the previous ten years, uses an income eligibility threshold as 80 percent of area median income (AMI). This income eligibility threshold was originally determined by AB 2723 in 2006, which defined "lower income," defined as 80 percent or below of AMI per Public Utilities Code 2852, and subject to deed and resale restrictions, can be eligible for SASH. Public Utilities Code 2852 references Section 50079.5 of the Health and Safety Code that defines "lower-income

⁶² D.18-06-027, p.30, and <https://www.cpuc.ca.gov/lowincomerates/>

households” as those households at or below 80 percent of AMI. The SASH program was later extended in AB 217 in 2013, and that bill upheld the same income eligibility threshold and the same deed and resale restrictions.⁶³

In D.18-06-027, Commission briefly discussed the change in income eligibility between DAC-SASH and the SASH program, and determined that DAC-SASH should use the CARE/FERA income threshold instead of 80 percent of AMI, with this rationale: “[t]he CARE and FERA income eligibility requirements, in general, are more restrictive than the income requirements for SASH, which allows for participation of households with incomes up to 80 percent of area median income. Because this program allows for participation of homes that are not deed-restricted, however, we believe that the lower income eligibility requirement is appropriate to ensure that program resources are used to benefit households with the most need of assistance.”⁶⁴

B. Justification for Relief Requested

GRID Alternatives requests that the income eligibility threshold for DAC-SASH be changed to 80 percent of AMI, building upon the success of the prior SASH programs, and recognizing the vast disparity in cost-of-living across the state. In the above-referenced rationale statement for changing the income threshold to CARE/FERA, the Commission implies that the removal of the deed restriction requirement in SASH will broaden eligibility of the DAC-SASH program, helping to justify the program’s more restrictive income threshold. The removal of deed restrictions does not broaden the DAC-SASH program compared to SASH, and so the tradeoff that the Commission is referring to does not exist. This is primarily because the SASH program, unlike DAC-SASH, allows for participation from low-income properties with presumed resale restrictions, which from an on-the-ground operational standpoint, makes the SASH program broader than the DAC-SASH program.⁶⁵

⁶³ AB 217, Section 3(a)(3)(C), October 17, 2013: “An individual residence sold at an affordable housing cost to a lower income household that is subject to a resale restriction or equity sharing agreement, for which the homeowner does not receive a greater share of equity than described in paragraph (2) of subdivision (c) of Section 65915 of the Government Code, with a public entity or nonprofit housing provider organized under Section 501(c)(3) of the Internal Revenue Code that has as its stated purpose in its articles of incorporation on file with the office of the Secretary of State to provide affordable housing to lower income households.”

⁶⁴ D.18-06-027, p.30

⁶⁵ The SASH Handbook notes that certain “presumed resale restrictions” qualify and are compliant with P.U. Code 2852, such as those found in federally-designated Empowerment Zones, Enterprise Communities, certain Neighborhood Revitalization Areas, Targeted Employment Areas, and Qualified

In reality, the CARE/FERA income threshold excludes households in high cost-of-living areas, resulting in an inequitable outcome where only households in lower cost-of-living areas in the state can access the program. High cost-of-living areas in California include the greater San Diego area and parts of the Bay Area; currently very few households in these areas are able to access DAC-SASH. Appendix 2 in the back of this filing includes chart of all 27 California counties within top 25 percent DACs, comparing the number of eligible households at 200 percent of FPL and 80 percent of AMI. Nearly all counties in the state would experience an increase in eligible households if DAC-SASH income eligibility was changed to 80 percent of AMI, but the most dramatic changes are in the high cost-of-living Los Angeles County and Orange County. GRID also includes support letters from nine CA cities recommending this modification to area median income whose citizens are unable to participate due to their high cost-of-living as compared to other areas of the state, including the Cities of Long Beach, Oakland, San Jose, and San Diego, among others, in Appendix 5.

A household that is low income compared to the high cost-of-living in their region is just as likely to suffer from a high energy burden as a low-income household in other areas of the state. For this reason, an income eligibility threshold that is pegged at *area* median income that automatically adjusts according to that region's cost-of-living is more equitable and appropriate for California than an income eligibility threshold set at a static level statewide, as the CARE/FERA threshold is.

The income limit of 80 percent of AMI is grounded in statute, as it is the threshold accepted by the state of California as a "lower income" household, according to P.U. Code 2852. This income threshold was used successfully by the SASH program for the past ten years. In D.18-06-027 it was the Commission's intention to maintain the many of the successful elements of the SASH program in DAC-SASH,⁶⁶ and in GRID's view, the income eligibility threshold of 80 percent of AMI should have been one of the program aspects passed from SASH to DAC-SASH.

Census Tracts. https://www.gosolarcalifornia.ca.gov/documents/SASH_Handbook.pdf. There are 1,598 Qualified Census Tracts alone in CA, over 40 Empowerment Zones, over 30 Neighborhood Revitalization Areas, which – taken together – constitutes a broader area and higher population than the 2,007 census tracts included in the CalEnviroScreen and the 1,063 census tracts that are in the CalEnviroScreen and also in an IOU, eligible for DAC-SASH. https://www.huduser.gov/portal/qct/data_request.html, <https://www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml>, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

⁶⁶ "All SASH program rules not specifically changed in this decision or Appendix A shall apply to the DAC-SASH program." D.18-06-027, p.30

Furthermore, the SGIP Equity Budget and Equity Resilience Budgets intentionally use the statutory definition of a lower income residence in Public Utilities Code 2852 for single-family homes, which is 80 percent of AMI.⁶⁷ Changing the DAC-SASH income eligibility threshold to 80 percent of AMI will align the requirements of DAC-SASH and the SGIP Equity programs, increasing the likelihood that customers in need of clean, affordable on-site resilience will pair solar and storage together. GRID further recommends that the income eligibility threshold be set at 80 percent of AMI, without any requirement for deed or resale restrictions. As part of this filing, GRID includes support letters from 14 tribes, nine cities and local governments, 16 advocacy groups and community partners, and seven DAC-SASH applicants and past SASH participants supporting the income threshold change to 80 percent of AMI in particular. GRID notes that it is requesting to change the income eligibility threshold for the DAC-SASH program only, and is not proposing to change the income eligibility thresholds for the GTDAC or the CSGT programs.

C. Relief Requested

GRID Alternatives requests that D.18-06-027 be modified so that the income eligibility for DAC-SASH be changed from CARE/FERA eligibility to 80 percent of area median income. GRID requests that these changes be made as expeditiously as possible after the Commission's approval of this PFM, and GRID will issue a Tier 2 Advice Letter within 30 days of the PFM approval implementing these changes.

D. Redline changes to Decision 18-06-027 for Relief Requested

Text on page 30

“Low-income customers of PG&E, SCE, and SDG&E are eligible for DAC-SASH if they own and occupy single-family homes in DACs as defined in this Decision, low-income census tracts or tribes, and meet the income eligibility requirements of ~~CARE or FERA~~ 80 percent of area median income or less, modeled after the SASH program. Because DAC-SASH provides a long-lasting capital improvement to properties, households must undergo an income verification process in order to qualify for DAC-SASH. ~~As a result, enrollment in CARE or FERA, which do~~

⁶⁷ D.17-10-004, October 12, 2017, p.15

~~not require an income verifications process, is not on its own sufficient to qualify a household to participate in DAC-SASH.~~

~~The CARE and FERA income eligibility requirements, in general, are more restrictive than the income requirements for SASH, which allows for participation of households with incomes up to 80 percent of area median income. Because this program allows for participation of homes that are not deed restricted, however, we believe that the lower income eligibility requirement is appropriate to ensure that program resources are used to benefit households with the most need of assistance.”~~⁶⁸

Note: GRID includes a redlined Appendix A from D.18-06-027 in Appendix 1 of this filing, which takes into account all proposed changes in this filing.

VI. REQUEST TO MODIFY DECISION 18-06-027 INCREASE ANNUAL FUNDING FOR THE DAC-SASH PROGRAM FROM \$10 MILLION TO \$20 MILLION, EFFECTIVE IN 2020

A. Background

D.18-06-027 initially funded the DAC-SASH program at \$10M per year through 2030, intended to cover both the solar incentives and program administration. The Commission did not discuss the funding level for the DAC-SASH program other than to note that \$10M per year was supported by the Utility Reform Network (TURN).⁶⁹ TURN’s April 2017 proposal for the implementation of AB 327 recommended that the SASH program be funded at an *additional* \$10 million per year, which would be added to the \$54 million already allocated to the SASH program through AB 217, and that this additional funding be allocated until 2021, the SASH sunset year.⁷⁰ GRID had proposed a SASH program extension in its AB 327 recommendations, extending the program through 2030 and funding the incentives and administration in a range of \$21-\$27 million per year.⁷¹

⁶⁸ GRID includes a portion of this same redline edit in Section IV.

⁶⁹ D.18-06-027, p.30

⁷⁰ Proposal and Comments of TURN on NEM 2.0 for Disadvantaged Communities, April 24, 2017, p.8

⁷¹ Proposal and Comments of GRID Alternatives on NEM 2.0 for Disadvantaged Communities, April 24, 2017, p.16-17. Note that GRID stated that SASH had been funded at \$7-\$9M per year, and that this amount should be tripled to fulfill the AB 327 requirement.

In D.18-06-027, the Commission also determined that the funding source of DAC-SASH should “use GHG allowance revenues to fund DAC-SASH, to the extent that such funding is available. If insufficient GHG allowance revenues are available in a given year, the remainder of the budget should be collected through customer rates.”⁷² The Commission determined that although the SOMAH program will use about two thirds of the GHG allowance revenues earmarked for renewable energy, there should be sufficient GHG funds leftover to fund the DAC-SASH program.⁷³ According to Public Utilities Code 748.5, the IOUs may allocate up to 15 percent of the GHG allowance revenues “for clean energy and energy efficiency projects established pursuant to statute that are administered by the electrical corporation, or a qualified third-party administrator as approved by the commission, and that are not otherwise funded by another funding source.”⁷⁴ SOMAH is eligible to receive 10 percent of the GHG allowance revenues allocated to the IOUs as described above (two-thirds of the 15 percent) or \$100 million whichever is lower, and the remaining 5 percent are to be shared between DAC-SASH, GTDAC, and CSGT. If there are not sufficient funds in the GHG allowance revenues for these three programs, they will be funded by customer rates.⁷⁵

Since D.18-06-027 created the DAC-SASH program, GRID has received guidance from the Commission that certain communities and customer types should be prioritized in DAC-SASH. The 2020 DAC-SASH Marketing, Education, and Outreach (ME&O) Plan, recently approved by the Commission’s Energy Division, outlines the strategies GRID will employ to serve communities identified by the Commission and the State as those in most need of investment, many of which are also served by complementary programs and resources. The Commission has encouraged GRID to include these “highest-need” communities in the ME&O Plan as target areas for the program, as further detailed below.

These high-needs communities are:

1. San Joaquin Valley disadvantaged communities:

The CPUC is exploring the economic feasibility of various options to bring affordable energy options to residents of disadvantaged communities in the San Joaquin Valley (SJV), many of

⁷² D.18-06-027, p.31

⁷³ *Ibid.*

⁷⁴ P.U.C. 748.5, (c)

⁷⁵ D.18-06-027, p.31, p.54, p.64

which lack access to natural gas and are reliant on propane and wood for cooking and heating. Assembly Bill (AB) 2672 (Perea) added Section 783.5 to the Public Utilities Code and CPUC initiated Rulemaking 15-03-010 to identify eligible communities and affordable energy options. During Phase I of the proceeding in May of 2017, the Commission identified 170 communities in the San Joaquin Valley in need of clean, affordable energy that will reduce reliance on propane and wood.⁷⁶ On December 13, 2018, the CPUC issued a decision approving pilot projects in 11 of the San Joaquin Valley disadvantaged communities identified in Phase II of the proceeding. The pilot projects will replace propane and wood burning appliances with all-electric appliances for 1,720 homes and natural gas line extensions for 224 homes.⁷⁷ The Commission required the SJV pilot PAs for each subset of electrification pilot projects to encourage participation in DAC-SASH, and directed community-level DAC-SASH targeting for one pilot community in particular, La Vina.⁷⁸ The pilots will also test an outreach and engagement strategy that utilizes local residents and community-based organizations to educate and enroll participants into the pilot projects. GRID has provided an Attestation letter to PG&E, SCE, and one other third party PA stating GRID's commitment to coordinate the implementation of the SJV pilots with the SASH and DAC-SASH programs by cross-referencing all potentially eligible customers.

2. High disconnection communities

High disconnection rate communities are those with high rates of electric customers who are disconnected from service due to non-payment. Consistent with Senate Bill (SB) 598 (Hueso 2017), the CPUC is seeking ways to reduce electric and gas utility disconnections, and to improve reconnection processes in the Energy Disconnections and Reconnections Rulemaking (R.18-07-005, Disconnections Proceeding). SB 598 acknowledges that disconnections of gas and electric utility customers have been rising and notes the public health impacts in terms of hardship and stress resulting from disconnections, especially among vulnerable populations. The Disconnections Proceeding is exploring solutions that will provide relief to households facing disruptive and harmful utility disconnections due to nonpayment of bills. As directed by the

⁷⁶ D.17-05-014, May 11, 2017

⁷⁷ <https://www.cpuc.ca.gov/SanJoaquin/>

⁷⁸ D.18-12-015, p.112, December 13, 2018

Commission, the IOUs publicly report on high-disconnection zip codes on a monthly basis to the Commission and service list of the proceeding.

3. Assembly Bill 617 communities

In response to AB 617 (C.Garcia, Chapter 136, Statutes of 2017), the California Air Resources Board (CARB) established the Community Air Protection Program (CAPP or Program). CAPP is a novel statewide effort that aims to develop a community-focused action framework for community air quality improvement in the most impacted areas. CAPP includes community air monitoring and community emissions reduction programs, involvement by a broad group of stakeholders, and integration of community, regional, and state level programs. Integrating DAC-SASH into AB 617 communities can help support the state's broad efforts through this new initiative.

In sum, GRID recognizes the Commission's intention for DAC-SASH-incented solar to be provided to the following high needs communities: San Joaquin Valley Disadvantaged Communities, High Disconnection Communities and AB 617 Communities.

B. Justification for Relief Requested

GRID is seeking a doubling of funding for the DAC-SASH program to \$20 million per year, beginning in on January 1, 2020 (the 2020 calendar year), in order to scale the program to meaningfully serve the communities in need outlined in this PFM, and the 'high needs' customers in the above-referenced section. The funding mechanism would be the same as outlined in D.18-06-027, which is via GHG auction revenues if available, and if not available, through customer rates. The total amount of funding for the DAC-SASH program would be \$230M for twelve-year entirety of the program; the 2019 collection would remain at \$10 million, and every subsequent year, including 2020, would collect \$20 million. For simplicity, GRID recommends maintaining the current budget split (85 percent incentives; 10 percent administration; 4 percent ME&O, and 1 percent program evaluation), but expects that it will be able to allocate a higher percentage toward incentives, due to administrative and ME&O efficiencies. Even within the existing \$10 million per year DAC-SASH budget, GRID has allocated a portion of the funds from the 12-year administration and M&O budgets to the

incentive budget, and expects to be able to increase this percentage with the proposed expanded budget.⁷⁹

i. Contributes to a robust COVID-19 response, centering equity

A doubling of funding will allow GRID to serve even more low-income families with a critical mechanism to reduce energy burdens during this time of economic downturn caused by the COVID-19 virus. At the time of this filing, construction workers, including those working on household construction in the solar industry, have been determined to be an essential workforce. The energy sector and “workers who maintain, ensure, or restore the generations, transmission, and distribution of electric power” have also been determined to be essential workforce under the same mandate.⁸⁰ As such, GRID and other solar companies are planning to continue operating during the statewide lockdown to provide essential services to households.⁸¹ Given that DAC-SASH is a mechanism to reduce energy burdens and provide channels for job training in a relatively secure industry sector for low-income families during the COVID-19 crisis, DAC-SASH should be enabled to serve more households now and in the future.

ii. Likelihood of funding via GHG auction revenues

While it is impossible to know the magnitude of GHG auction revenues in future years, the year 2020 used as a proxy indicates that GHG auction revenues will likely be able to accommodate the full set of programs funded by the IOUs’ 15 percent to cover clean energy programs, even with a doubling of DAC-SASH funds. Table 4 below displays the 2020 GHG auction revenues collected from each IOU, the amount allocated to clean energy and energy efficiency (in the year 2020, this is slightly lower than 15 percent), and the allocations for SOMAH, the CSGT and GTDAC programs, other clean energy programs, and twice the budget of DAC-SASH. GRID notes that for this analysis, we project SOMAH to be funded at its maximum authorized amount of \$100 million per year, rather than including the SOMAH ‘true-up’ that occurred in 2020 to

⁷⁹ GRID allocated the amount in its administrative contract; and will file a Tier 2 Advice Letter to formally move these funds to incentives, a process established in SASH. D. 15-01-027, p.45-46, January 30, 2015, in Rulemaking 12-11-005

⁸⁰ California Coronavirus (COVID-19) Response <https://covid19.ca.gov/stay-home-except-for-essential-needs/>

⁸¹ See also: California Solar + Storage Association. *COVID-19 Essential Services Memo*. March 21, 2020. <https://calssa.org/covid/2020/3/21/memo-on-essential-service-exemptions>

make up for SOMAH undercollections for the previous several years, as a true-up will not be an annual occurrence. Using 2020 as a proxy, there would be more than \$7 million left over in the GHG auction revenue clean energy funds when the budget for DAC-SASH is doubled. GRID believes this analysis is conservative, because: 1) it includes funding for other programs listed in 2020 that may not occur in future years;⁸² and 2) the actual clean energy/energy efficiency funds collected in 2020 is less than 15 percent of the total GHG auction revenues.

Table 4: 2020 GHG Auction Revenues for Clean Energy/Energy Efficiency, Proxy⁸³

GHG Auction Revenues Allocated to CE/EE ⁸⁴	\$146,930,000
SOMAH Allocation, no True Up ⁸⁵	\$100,000,000
DAC-SASH x 2	\$20,000,000
GTDAC and CSGT Allocation	\$9,693,545
Other Programs	\$10,000,000
TOTAL GHG Auction Revenues Earmarked to CE/EE	\$139,693,545
Leftover Clean Energy/Energy Efficiency Funds	\$7,236,455

GRID also includes Table 5, which lists the GHG auction revenues allocated to the IOUs for the past three fiscal years, an estimated maximum level of CE/EE funds at 15 percent of the GHG auction revenues, and an analysis of the theoretical leftover funds if the same earmarked CE/EE funds are allocated with a doubling of DAC-SASH, as outlined in Table 4. Table 5 shows that in the past three years, the GHG auction revenues have been high enough to accommodate a

⁸² Refers to D.20-01-022, p.37; SCE's Clean Energy Optimization Pilot. GRID notes that this program may not exist for all collection years, but includes it in this table for completeness.

⁸³ Funding numbers have been taken from the Decisions approving Applications of the IOUs for Adoption of Electric Revenue Requirements and Rates Associated with its 2020 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation. D.20-02-047 (PG&E), Section 3.2.4; D.20-01-022 (SCE), Sections 6.2-6.4; D.20-01-005 (SDG&E), Section 4.

⁸⁴ GRID uses actual allocated funds from IOU applications rather than calculating 15% of the total GHG proceeds.

⁸⁵ In the Decisions referenced in this table, the Commission directed the IOUs to correct shortfalls to the SOMAH program from 2016 - 2019 in their 2020 GHG auction revenue allocations. In the cases of PG&E and SCE, the Commission also directed those IOUs to collect less than the total SOMAH program cost for the year 2020. GRID does not include these corrections or modifications here, and instead uses \$100,000,000, the total maximum SOMAH annual program cost as authorized in Assembly Bill (AB 693), Section (c).

doubling of the DAC-SASH budget without having to rely on additional ratepayer funds. In fact, there would be funds left over in excess of \$8 million per year.

Table 5: Historical Analysis of GHG Auction Revenues and Clean Energy, Energy Efficiency, Proxy

Fiscal Year	IOU GHG Auction Revenues ⁸⁶	Estimated GHG Auction Revenues to CE/EE	CE/EE Earmark with Doubled DAC-SASH	Leftover CE/EE Funds
2018-2019	\$1,265,950,466	\$189,892,570	\$139,693,545	\$50,199,025
2017-2018	\$988,754,233	\$148,313,135	\$139,693,545	\$8,619,590
2016-2017	\$1,151,988,100	\$172,798,215	\$139,693,545	\$33,104,670

While the total amount of GHG auction revenues in future years remains a matter of speculation, GRID is encouraged that the past four years (inclusive of 2020) would accommodate a doubling of DAC-SASH within the allocated 15 percent of GHG auction revenues dedicated to energy efficiency and clean energy programs. Based on this analysis, GRID believes it is likely that future years will be able to accommodate a DAC-SASH budget of \$20 million per year without relying on an additional customer rates account to fulfill DAC-SASH funding needs.

GRID is open to a solution wherein DAC-SASH is funded at a minimum of \$20 million every year, with flexibility for the IOUs to collect more than \$20 million total if GHG auction revenues allow, until the program hits its maximum of \$230 million. The intent of this flexibility is to minimize the likelihood that DAC-SASH funding would require reliance on an additional customer rate-based funding source in any given year.

iii. Ensures resources required to meaningfully serve high-needs communities

The current annual incentive budget of DAC-SASH limits the overall integration potential with high-needs communities. The DAC SASH program provides limited outreach and incentive dollars that have to be spread across DAC communities. Furthermore, GRID by necessity needs to operate DAC-SASH in areas in which additional gap funding resources have been identified. To be specific, GRID outlines the impact to the DAC-SASH budget of targeting these high-needs communities at the current funding level of \$10 million per year:

1. San Joaquin Valley disadvantaged communities:

⁸⁶ California Cap and Trade Program: Summary of Proceeds to California and Consigning Entities, updated March 2020: https://ww3.arb.ca.gov/cc/capandtrade/auction/proceeds_summary.pdf

Because all PG&E SASH funds are fully reserved, all SJV pilot projects will utilize DAC-SASH funds in PG&E. SJV projects in SCE could be a split for 2020 and 2021, as the SASH funds are expected to be encumbered in 2021.

While it is unknowable how many of the 1,720 homes in the 11 pilot communities may qualify for DAC-SASH, the San Joaquin pilot communities have received information via community meetings about the clean energy options available to them over the past two years, and GRID expects a healthy level of attention to DAC-SASH from these communities. Furthermore, it is important to note that the pilot projects represent only 11 of the 170 SJV communities. It is likely that during Phase III of the SJV proceeding, additional homes in the expanded set of communities will be candidates for DAC-SASH, and will have DAC-SASH directly marketed to them by the SJV PAs and GRID Alternatives. When the Commission determined the methodology for identifying qualifying communities in the San Joaquin Valley DAC proceeding, the Commission noted a high level of overlap between the ‘San Joaquin Valley DACs’ and the top 25 percent CES census tract DACs.⁸⁷

GRID is concerned about the plausible situation in which members of the San Joaquin Valley DAC communities are marketed DAC-SASH, but the program’s incentive funds have already been encumbered. Notably, the SJV DAC communities are only present in SCE and PG&E, and not in SDG&E; SDG&E has no SJV DAC communities and very few CES census tracts, driving the need for a DAC-SASH geographic expansion as described in Section IV. GRID recommends that additional dollars be allocated to DAC-SASH incentives so that low-income SJV residents have dedicated access to an on-site solar option to support electrification measures in these communities.

2. High disconnection communities

Through the R.18-07-005 service list, GRID receives and tracks the Monthly Disconnection Data Reports submitted by each IOU and analyzes the report's data (e.g. number of customers disconnected, number of customers in arrears, etc.) This information is helpful in prioritizing DAC-SASH ME&O activities to the zip-codes with recurring indicators of payment trouble and/or disconnections.

⁸⁷ D.17-05-014, May 11, 2017, p.14

In the analysis captured in Tables 6 and 7 below, GRID finds that for PG&E and SCE, there is a strong overlap between the top ten high disconnection zip codes⁸⁸ and CES top 25 percent statewide DACs, the existing geographic eligibility threshold for DAC-SASH, even with conservative estimates for eligibility.⁸⁹ If GRID extended outreach beyond simply the top ten highest disconnected zip codes in SCE and PG&E, GRID could foresee the disconnection population taking the majority of DAC-SASH funds in those service territories, leaving limited funds left over for other high needs populations. In SDG&E, there are so few top 25 percent CES census tract DACs that an analysis of DAC and high disconnection overlap would not be meaningful.

⁸⁸ The total number of disconnections for PG&E and SCE was tabulated by month from the Monthly Disconnection Reports submitted by each utility to the Disconnections docket (R.18-07-005) as required by D.18-12-013. The data was then filtered by 1) IOU; then 2) highest total disconnections for each month; then 3) tabulated across calendar year 2019. This data now showed which zip codes had the most total number of monthly disconnections for calendar year 2019 and could be displayed in the top ten highest disconnected zip codes.

⁸⁹ GRID only counted ‘low income households’ as those making less than \$25,000 per year, which is below 200% of the FPL for a household of one. Since the FPL rises as household size increases, in reality there will be many more households that will qualify for DAC-SASH based on the current income limit of 200% of FPL. GRID gleaned income data per zip code using Internal Revenue Service (IRS) data from a downloadable spreadsheet that displayed the statement of income on tax returns by zip code in California for 2017. ‘Head of household’ number of returns was used. This analysis also assumes an even distribution of low-income households across each zip code. However, it is likely that there is a stronger correlation between low-income household location and DAC overlap than is shown in this analysis.

Table 6: PG&E DAC and High Disconnection Overlap Analysis

Top 10 High Disconnection Zip Code	94590	93307	94509	95207	94533	94591	93722	93727	94806	94565
Est. DAC Overlap ⁹⁰	20%	90%	16%	46%	0%	0%	63%	65%	55%	56%
Head of Household Tax Returns < \$25K in Zip	1,480	4,310	2,090	1,920	1,990	1,090	3,100	2,960	1,560	2,680
Est. High Disconnection Low-Income Households in DACs	296	3,879	334	883	0	0	1,953	1,865	858	1,501
Total Est. High Disconnection Low-Income Households in DACs	11,569									
IOU Total DAC-SASH Funded Projects	4,104									

Table 7: SCE DAC and High Disconnection Overlap Analysis

Top 10 High Disconnection Zip Code	92404	92553	92335	93550	90805	92376	90706	90201	91730	93257
Est. DAC Overlap	69%	86%	95%	0%	93%	70%	82%	100%	34%	51%
Head of Household Tax Returns < \$25K in Zip	3,120	3,300	3,790	3,840	4,030	3,300	2,600	4,350	1,670	3,160
Est. High Disconnection Low-Income Households in DACs	2,153	2,838	3,601	0	3,748	2,310	2,132	4,350	568	1,612
Total Est. High Disconnection Low-Income Households In DACs	23,311									
IOU Total DAC-SASH Funded Projects	4,200									

⁹⁰ To arrive at the ‘DAC Overlap’ percentage, GRID found the census tracts contained in each zip code, and determined if each census tract was a DAC, according to data found at the CalEnviroScreen 3.0 website. The same source provided the population for each census tract, and the DAC Overlap percentage was calculated as [zip population in DAC census tracts]/[total zip population]).

GRID hopes and expects to extend targeted DAC-SASH marketing, outreach and education to high disconnection zip codes, going beyond the top ten zip codes listed in this filing, and adapting to new data on disconnections that the IOUs may post to the disconnections rulemaking, R.18-07-005. It is particularly important to serve this population with the permanent bill relief benefit provided by DAC-SASH, because disconnections are occurring due to nonpayment of utility bills, indicating that this population already experiences untenable energy burdens. As shown in the Disconnections Proceeding thus far, a disconnection due to nonpayment, even if short in length, can introduce harmful stressors to families, including inability to maintain employment and jeopardization of child guardianship.⁹¹ GRID views DAC-SASH as a mechanism not only to reduce energy burdens for those families, but also to avoid the cascade of harms that could befall these families if they are disconnected due to nonpayment. It is not surprising or alarming that the estimated total pool of high disconnected, low-income DAC customers currently exceeds the total program funding in each IOU, given that many customers are expected to drop out, as outlined in Section IV of this filing. However, it is noteworthy that in SCE alone, this conservative estimate of high disconnected low-income DAC customers is more than five times the amount of funded DAC-SASH projects in the whole IOU. If we applied the marketing funnel estimate of converted customers in Section IV of 6 percent, then the total DAC-SASH projects going to high disconnection zip codes in SCE would be roughly one third of the total funded projects in SCE currently, which GRID believes may strain the program to meaningfully serve the high disconnected customers and as well as other high needs customers. For GRID to serve high disconnection communities meaningfully, the DAC-SASH program must be funded beyond its current funding level.

3. Assembly Bill 617 communities

Fourteen of the 16 AB 617 communities selected for 2019 are in an IOU territory, and many of the community emissions reduction programs aim to utilize DAC-SASH as part of their emission reduction strategy. To illustrate, both the city of Fresno and the town of Shafter name intent to leverage DAC-SASH specifically in their planning, and other cities such as San Bernadino describe goals related to solar and low-income residents, which GRID assumes will also look to

⁹¹ Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs., R.18-07-005, July 20, 2018, p.3

access DAC-SASH to achieve.⁹² Shafter describes its intent to couple its own investment of \$1.5 million with \$13.5 million from State programs including DAC-SASH to create \$15 million for residential solar. Given that Shafter is a small town of 18,000 people, GRID expects that larger communities would purport to utilize more DAC-SASH funding for projects. Fresno's plan describes its planned partnership with the DAC-SASH program through 2024, and both Shafter's and Fresno's plans appear to assume there would not be a limit to their residents' ability to access incentives from these programs. As part of the DAC-SASH 2020 ME&O plan, GRID's teams across the state have begun outreach to AB 617 communities. GRID will continue leveraging existing partnerships in communities in which it has an established presence, and/or access to gap financing resources, and will also begin to expand operations to new communities including those identified through AB 617 compliance.⁹³ In practice to date in 2020, GRID can report that local teams, particularly in PG&E's service territory and in the Central Valley, have already begun to encounter barriers to broad outreach in AB 617 communities due to limitations with incentive availability, which is also proving to be a limiting factor in reaching SJV communities in PG&E's service territory as well.

An increase in funding will result in roughly a doubling of DAC-SASH funded projects in each IOU territory (see Tables 1-3 in this filing). GRID views this doubling of funded projects as necessary to serve the high needs communities outlined in this filing.

While GRID shares the Commission's goal of program coordination and alignment, the on-the-ground reality is that the existing DAC-SASH funding does not allow for the scale of program coupling envisioned by the Commission. Funding must be increased to allow for the program coordination and integration delineated in the approved ME&O Plan. At minimum, a doubling of incentive funds should be approved, and re-evaluated in 1-2 years for adequacy given the potential modification of high-interest areas for the Commission and State.

⁹² <http://community.valleyair.org/media/1515/01-finalshaftercerp-9-19-19.pdf>;
<http://community.valleyair.org/media/1516/01finalscfresnocerp-9-19-19.pdf>;
<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025a.pdf?sfvrsn=8>.

⁹³ 2020 DAC SASH Marketing, Education, and Outreach Plan, at pg. 16. "Gap financing" refers to the gap between the available incentive amount and the actual system cost. GRID relies on gap financing from its philanthropic work, equipment partnerships, and local resources to cover the gap financing needs for DAC-SASH participants, making the systems no cost to low-income families.

C. Relief Requested

GRID requests that the Commission double the funding of the DAC-SASH program from \$10 million per year to \$20 million per year, beginning on January 1, 2020 for the calendar year 2020. The source of funding (GHG auction proceeds if available and customer rates if not available) would remain the same. The total funding of the DAC-SASH program would be \$230 million. GRID requests that the funds collected for the increased DAC-SASH budget would occur during the next IOU funding cycle for DAC-SASH after this PFM is approved.

D. Redline changes to Decision 18-06-027 for Relief Requested

Text on page 30:

~~“As recommended by~~ Aligning with the recommendation by TURN, the DAC-SASH program will have ~~an annual 2019~~ budget of \$10 million ~~per year~~ beginning on January 1 2019, and an annual budget of \$20 million per year beginning on January 1 2020, ~~and~~ continuing through the end of 2030.⁹⁴

Conclusion of Law 9, page 96:

9. It is reasonable to adopt an annual DAC-SASH budget of \$10 million for 2019 and \$20 million per year beginning on January 1, 2019~~20~~, ~~and~~ continuing through the end of 2030.

Conclusion of Law 10, page 97:

10. It is reasonable that the \$10 million 2019 DAC-SASH budget and the \$~~1~~20 million per year DAC-SASH budget starting January 1, 2020 should be collected first through available GHG allowance proceeds. If such funds are exhausted, it is reasonable that the DAC-SASH program should be funded through public purpose program funds.

Conclusion of Law 11, page 97:

11. It is reasonable to require PG&E, SCE, and SDG&E to track the \$10 million 2019 DAC-SASH budget and the annual DAC-SASH budget of \$~~1~~20 million per year, starting January 1, 2020, in balancing accounts starting in 2019.

Ordering Paragraph 8, page 102-103:

⁹⁴ GRID clarifies that the increase in funds should begin on January 1, 2020. GRID proposes that the \$10 million per year collected in 2019 remain intact, and no increase of funds for 2019, or retraction of funds for 2019, shall occur.

8. The Disadvantaged Communities – Single-family Solar Homes (DAC-SASH) program shall have a 2019 budget of \$10 million and an annual budget of \$~~1~~20 million per year beginning on January 1, 20~~19~~20, ~~and~~ continuing through the end of 2030. Each participating utility will contribute its proportionate share of this budget based on its relative percentage of retail electric revenue. Within 60 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall each file a Tier 2 advice letter establishing a balancing account to collect its proportionate share of the \$10 million 2019 DAC-SASH budget and the \$~~1~~20 million per year DAC-SASH budget ~~starting in~~ 2019, and will collect those costs first through available GHG allowance proceeds. If such funds are exhausted, the DAC-SASH program will be funded through public purpose program funds through the conclusion of the program in 2030. DAC-SASH program funds will be reviewed in the annual Energy Resource Recovery Account proceedings. The utilities shall propose a mechanism to recover the costs through distribution rates. Money not allocated to specific projects or program expenses by the program end date of December 31, 2030, will be returned to ratepayers at the conclusion of the program.

Note: GRID includes a redlined Appendix A from D.18-06-027 in Appendix 1 of this filing, which takes into account all proposed changes in this filing

VII. CONCLUSION

GRID thanks the Commission and stakeholders for their engagement on this important issue, and looks forward to enacting these proposed changes in DAC-SASH, so that the program may be implemented more equitably, and may be more responsive to high-needs communities, fire threat responses, and the COVID-19 economic downturn.

Respectfully submitted,

/s/ Elise Hunter

GRID Alternatives

Elise Hunter

Director, Policy & Regulatory Affairs

1171 Ocean Ave, Suite 200

Oakland, CA 94608

Telephone: (510) 338-9546

Facsimile: (510) 225-2585

ehunter@gridalternatives.org

April 24, 2020

APPENDIX A

Disadvantaged Communities - Single-family Solar Homes Program

The Disadvantaged Communities – Single-family Solar Homes (DAC-SASH) program offers solar incentives to resident-owners of single-family homes in eligible disadvantaged communities. A disadvantaged community (DAC), for the purpose of the DAC-SASH Program, is a community that appears in the top 25% of census tracts statewide when using the CalEnviroScreen 3.0 tool.⁹⁵ In addition, 22 census tracts in the highest 5 percent of CalEnviroScreen’s Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are also designated as DACs. In addition to DACs, the DAC-SASH program shall be eligible to low-income census tracts, defined as census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093, and to tribes. The program will pay incentives towards a solar energy system that is defined as a solar energy device that has the primary purpose of providing for the collection and distribution of solar energy for the generation of electricity, that produces at least one kilowatt of electricity. Only eligible households may receive program incentives and are encouraged to apply.

The goal of the DAC-SASH program is to provide opportunities for existing low-income customers within disadvantaged communities and other communities of high need to overcome barriers accessing on-site, solar photovoltaic (PV) systems to decrease electricity usage and bills without increasing monthly household expenses. Public Utilities Code § 2871(b)(1) requires the Commission to “Ensure that the standard contract or tariff made available to eligible customer-generators ensures that customer-sited renewable distributed generation continues to grow sustainably and include specific alternatives designed for growth among residential customers in disadvantaged communities.”⁹⁶

⁹⁵ The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency, CalEPA, develops and updates the CalEnviroScreen tool to evaluate effects of pollution on vulnerable communities statewide, pursuant to Public Resource Code § 71090. The CalEnviroScreen 3.0 is the most current version of the tool.

⁹⁶ All statutory references are to the Public Utilities Code unless otherwise noted.

Major Responsibilities of the Program Administrator

The Program shall be administered by one entity for all applicants within the service territories of PG&E, SCE, and SDG&E.

The Program Administrator (PA) will be a single entity capable of providing statewide outreach, marketing and implementation activities for the program. Once the DAC-SASH Program Handbook is adopted, program adjustments may be proposed by the PA via a Tier 2 Advice Letter. Pursuant to party responses and Energy Division review of the advice letter, staff will determine if suggested program changes(s) require a resolution or modifications of a Commission order, and if so, the changes(s) could be considered by the full Commission, following notice to parties and an opportunity to comment.

Selection of the Program Administrator

The PA will be selected through a competitive solicitation, Request for Proposals (RFP). RFP responses will be evaluated to determine whether potential the PA is adequately staffed with personnel who have the following qualifications and experience:

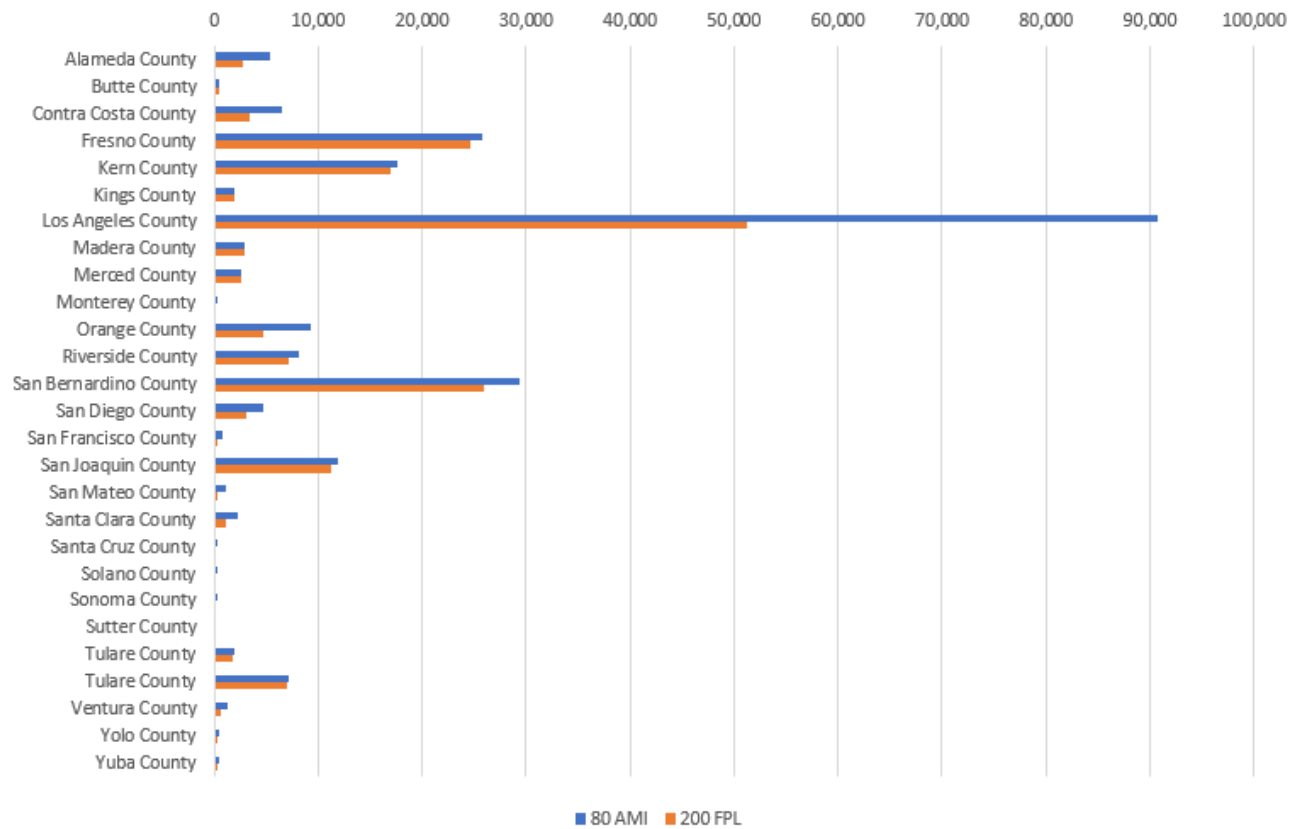
- ☐ Experience installing and/or designing solar PV systems
- ☐ Experience serving low-income populations
- ☐ Experience developing marketing strategies directed at low-income communities and accessible communications for persons with disabilities
- ☐ Experience creating finance packages appropriate for energy efficiency measures and/or solar energy systems
- ☐ Knowledge of the needs of low-income, single-family homeowners
- ☐ Language ability for major language requirements of eligible low-income populations
- ☐ Knowledge of CARE and FERA programs
- ☐ Experience and knowledge of energy-efficiency measures and energy audits at the residential level
- ☐ Ability to create partnerships with private sector financing entities
- ☐ Experience delivering programs through collaboration with multiple stakeholders (i.e., no preexisting constraints on partnering latitude)

- ☐ Knowledge of or experience with job training and/or workforce development programs, especially for low-income communities
- ☐ Data gathering and analysis skills

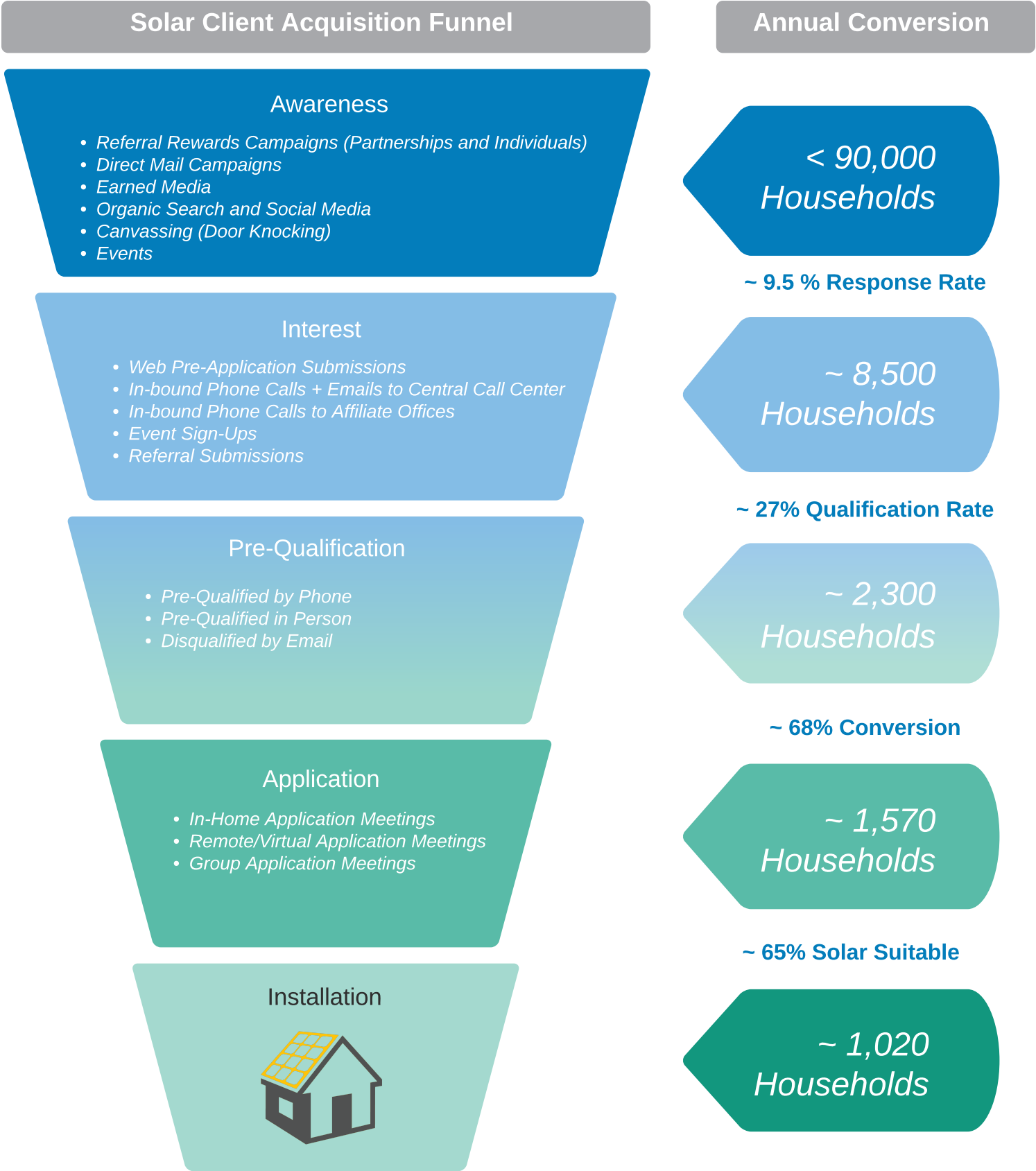
The successful bidder for PA must demonstrate the ability to perform the following functions:

- ☐ Establish relationships with low-income, single family homeowners
- ☐ Establish relationships with community-based organizations that serve low-income homeowners to conduct outreach
- ☐ Partner and work with solar installers to install PV on target homes, and partner with appropriate entities to develop “green job” training or other workforce development programs
- ☐ Hire multilingual staff to meet language requirements of low-income populations
- ☐ Hire staff that can develop communications accessible to persons with disabilities
- ☐ Educate low-income customers on solar technology and energy efficiency measures
- ☐ Create a marketing plan to attract eligible populations of all qualifying income levels
- ☐ Build organizational capacity to meet the demands of a statewide program
- ☐ Implement the strategy through a program implementation plan, through either a phase-in or statewide approach, to achieve program milestones
- ☐ Collaborate and partner with city and county housing agencies to create in-place, flexible financing packages
- ☐ Explore other funding options with corporations and government agencies
- ☐ Work with PG&E, SCE, and SDG&E to direct incentive payments to eligible recipients

Appendix 2: Comparison of Households Eligible for DAC-SASH Using 200 percent of FPL Vs. 80 percent of AMI

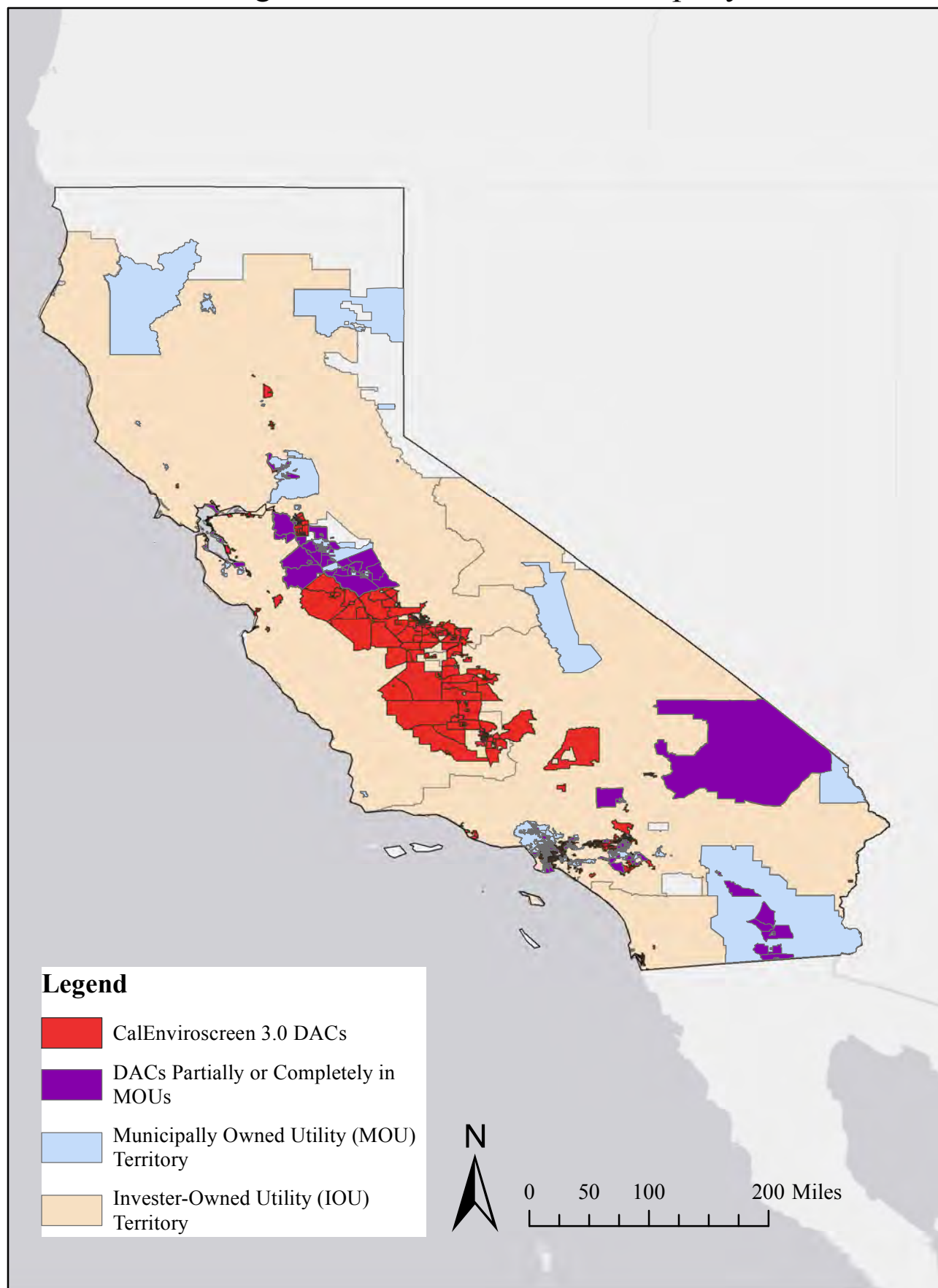


Appendix 3: SASH/DAC-SASH Client Acquisition Funnel

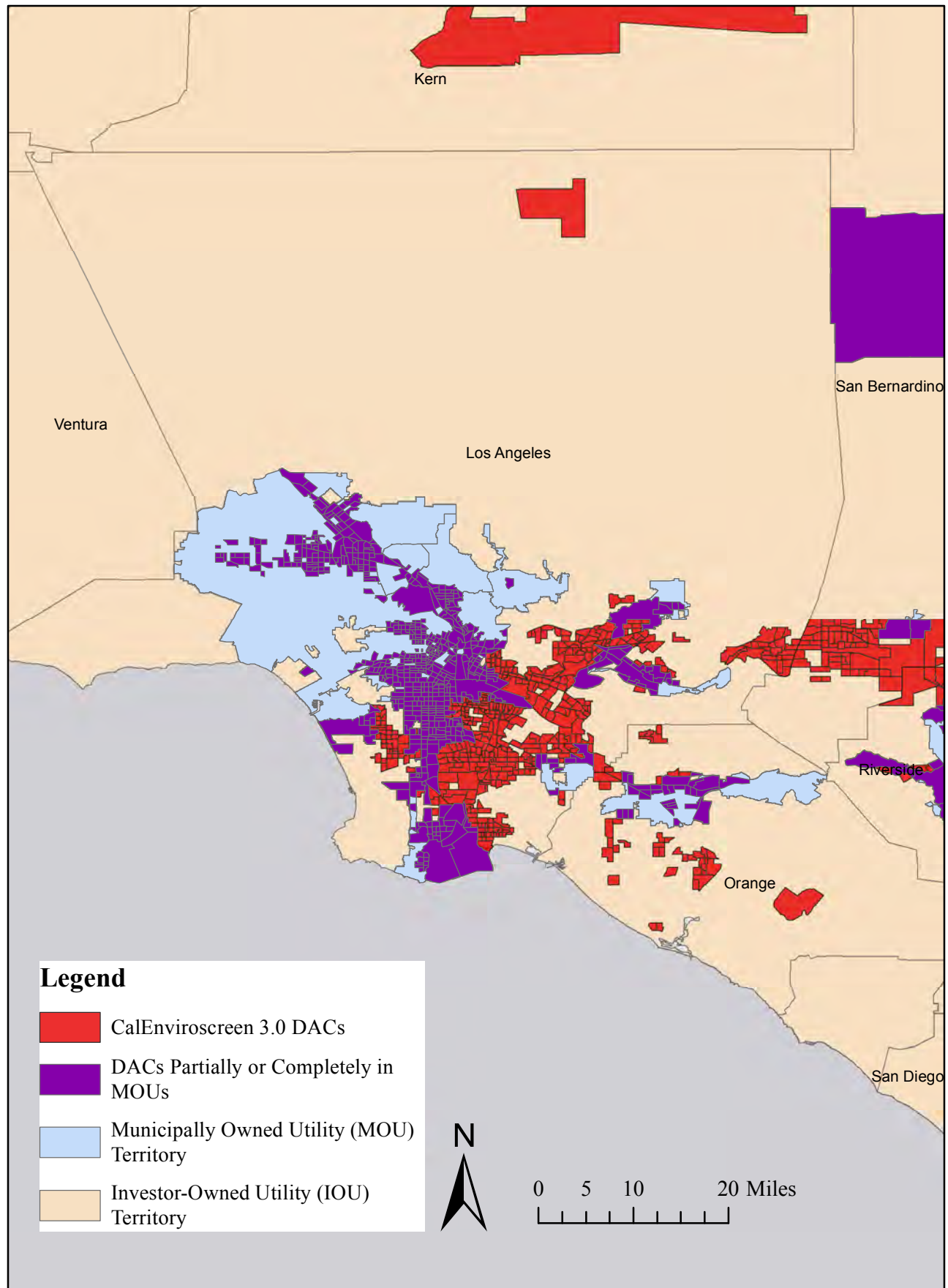


Appendix 4: Illustrative Maps

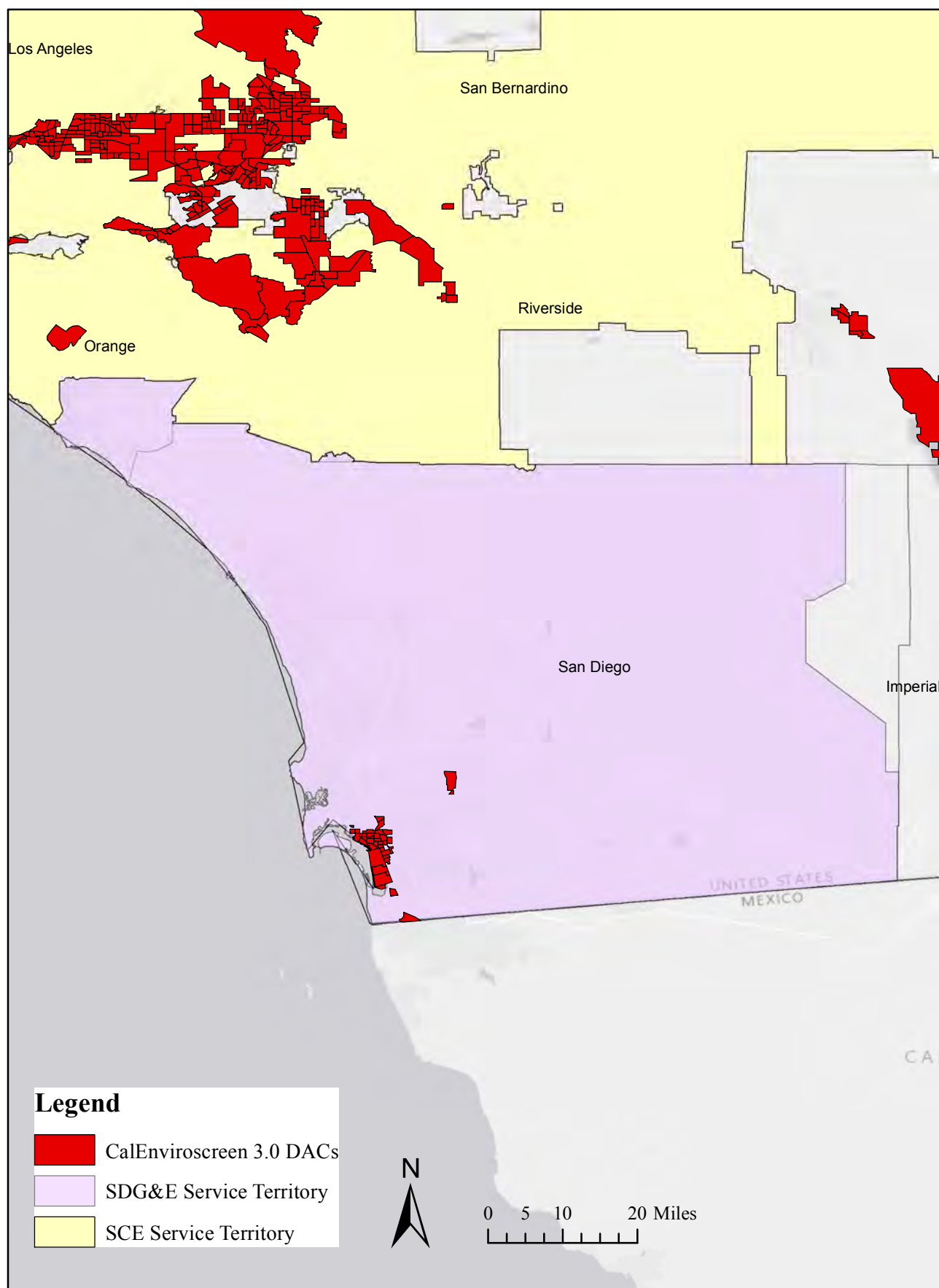
CES 3.0 Disadvantaged Communities and Municipally Owned Utilities



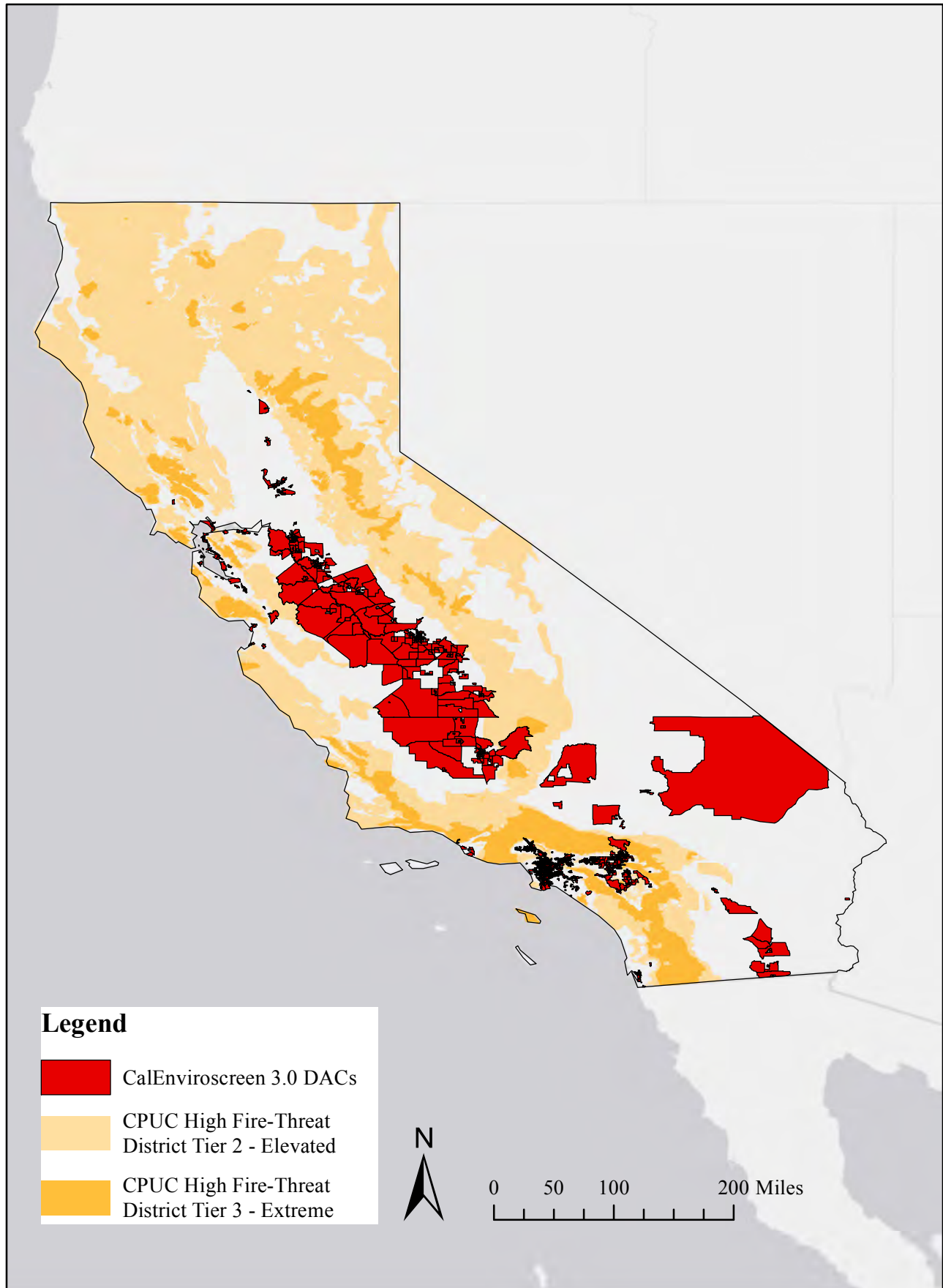
CES 3.0 Disadvantaged Communities in Los Angeles County



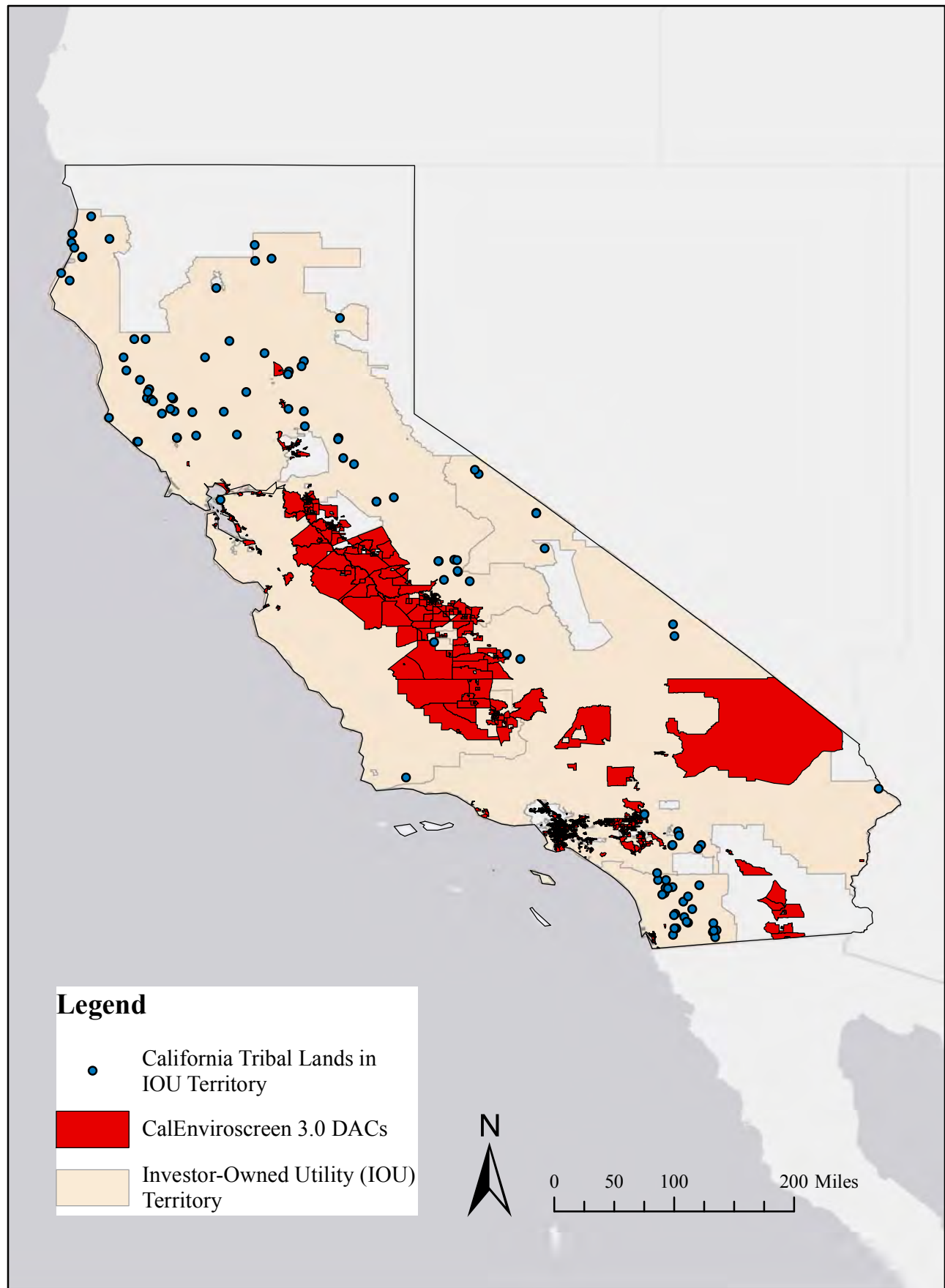
CES 3.0 Disadvantaged Communities in San Diego County



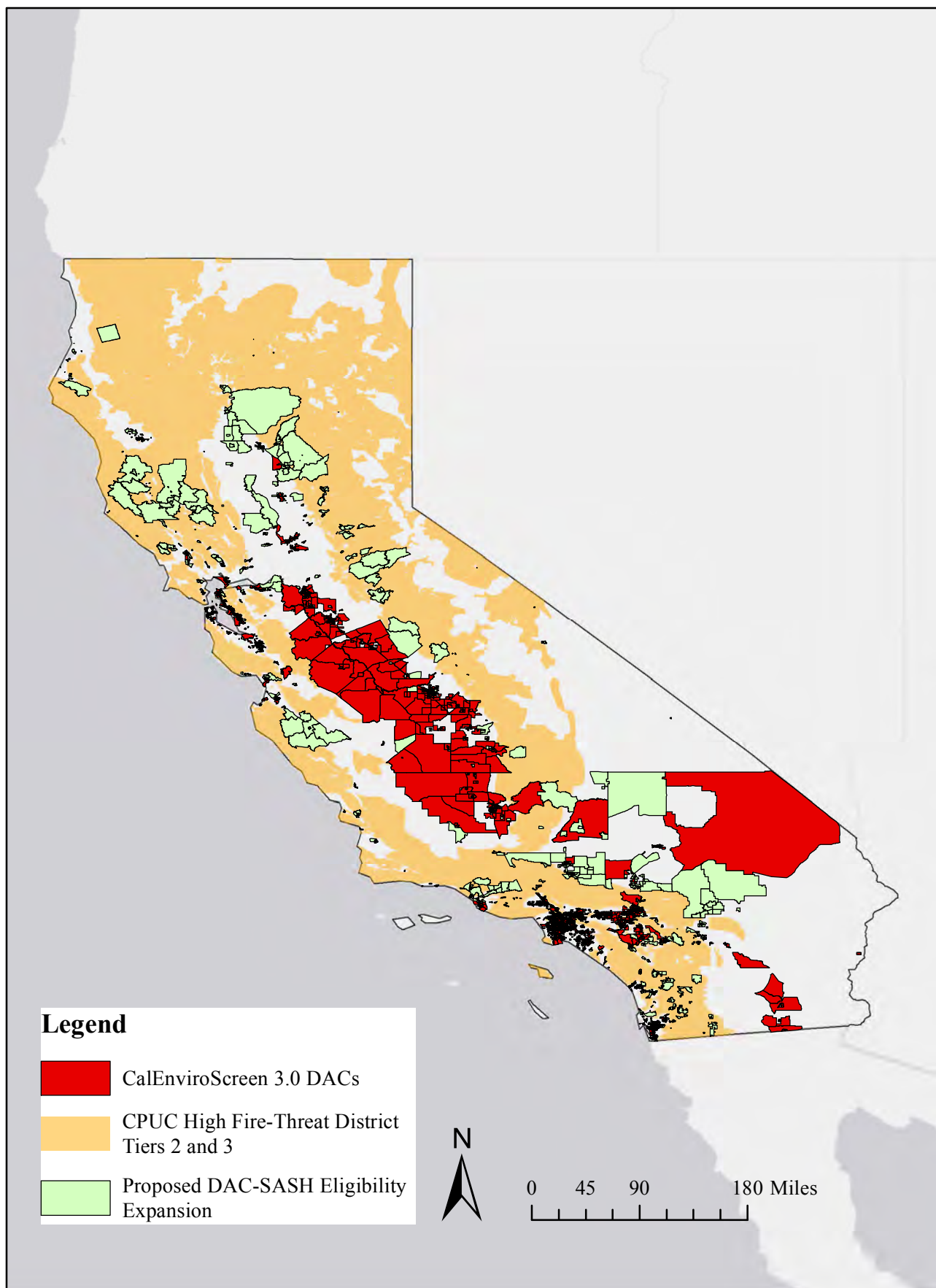
CES 3.0 Disadvantaged Communities and High Fire-Threat Districts



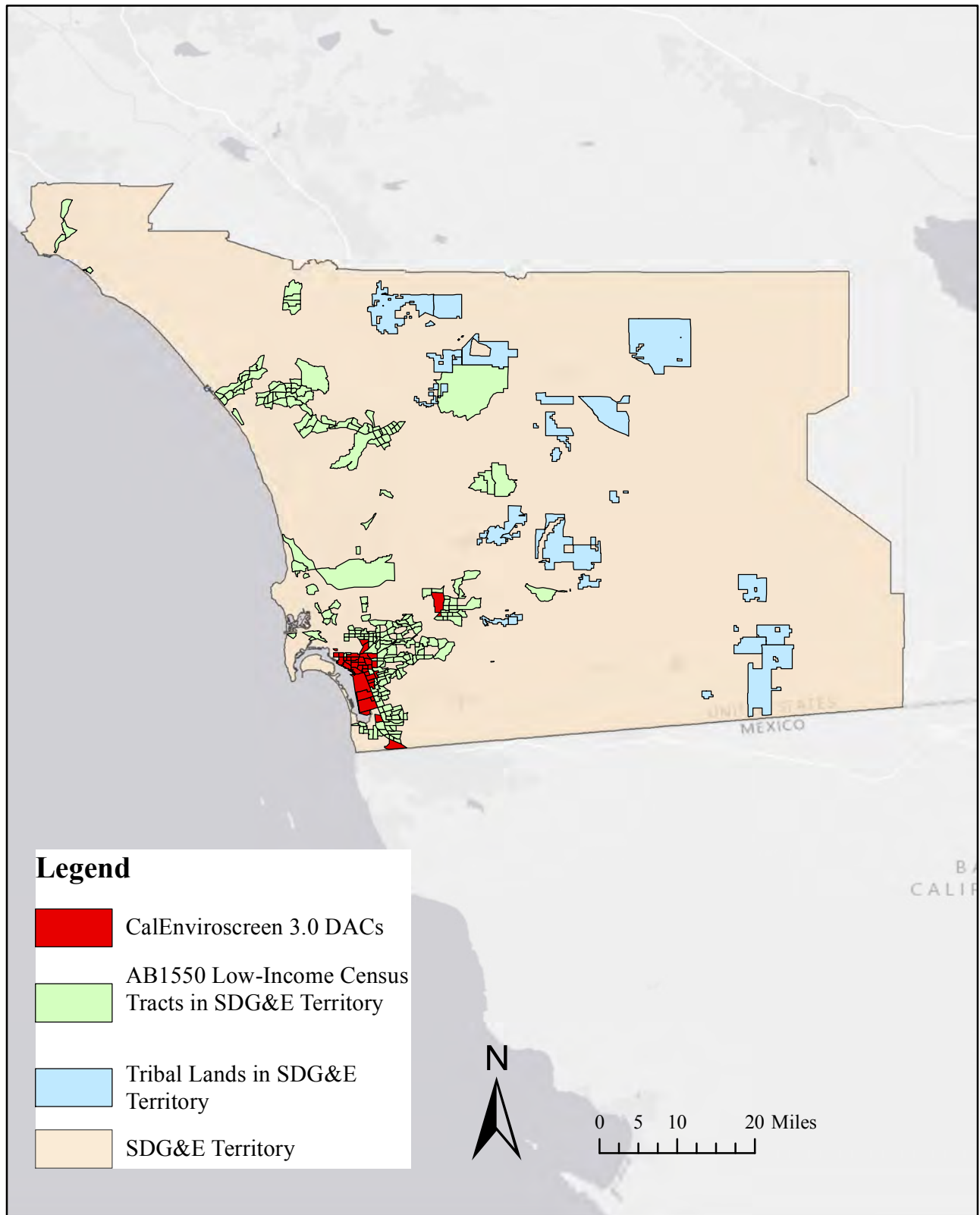
CES 3.0 Disadvantaged Communities and Tribal Lands



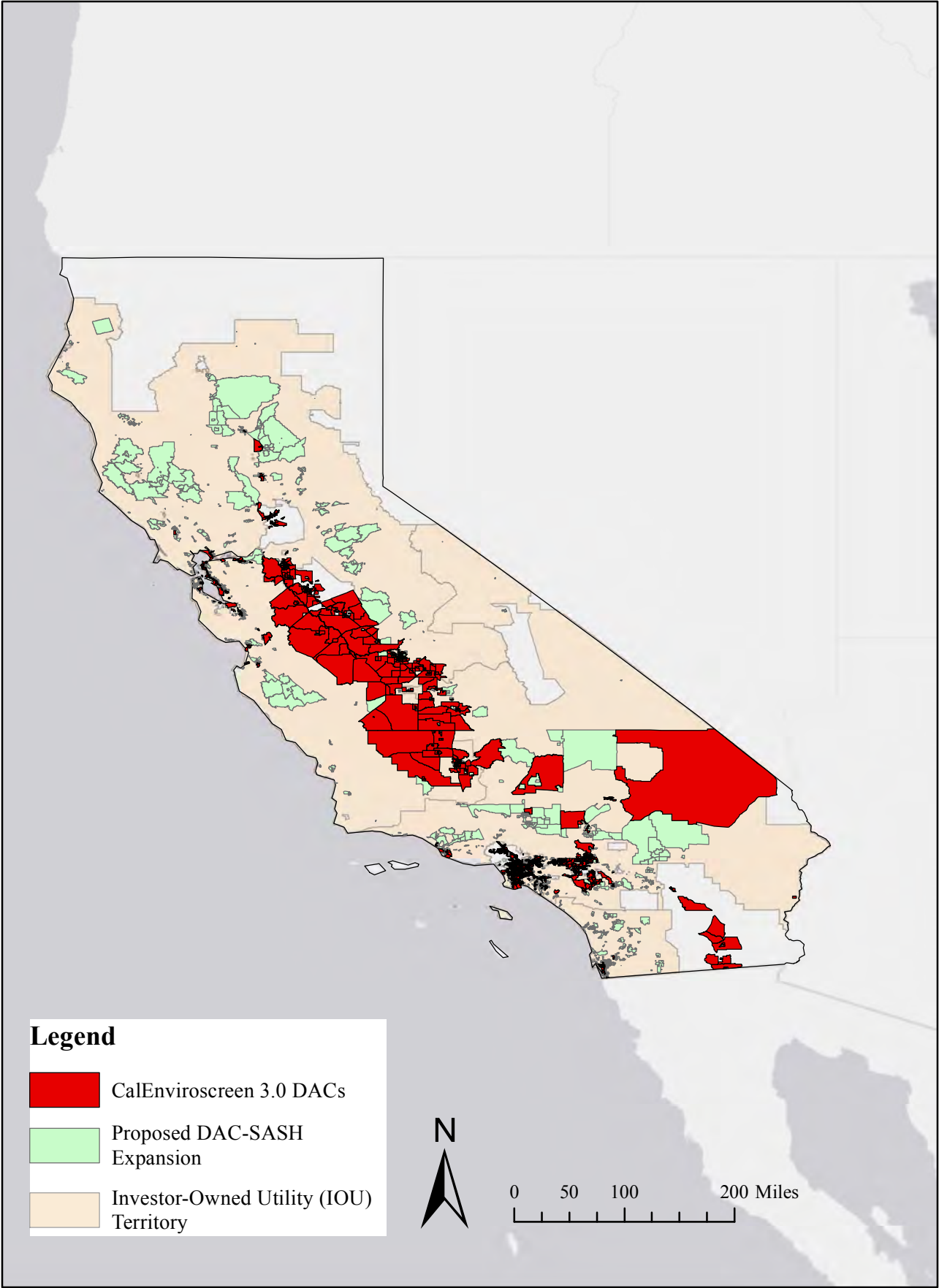
Proposed DAC-SASH Expansion and High Fire-Threat Districts



Proposed DAC-SASH Expansion - SDG&E Territory



CES 3.0 Disadvantaged Communities and Proposed DAC-SASH Expansion



Appendix 5: Stakeholder Letters of Support

Tribal Nations and Tribal Organizations

All Mission Indian Housing Authority	<i>Temecula, CA</i>
Bear River Band of the Rohnverville Rancheria	<i>Loleta, CA</i>
Bishop Paiute Tribe	<i>Bishop, CA</i>
Campo Band of Mission Indians	<i>Campo, CA</i>
Chemehuevi Indian Tribe	<i>Havasupai Lake, CA</i>
Guidiville Rancheria	<i>Talmage, CA</i>
La Jolla Band of Luiseno Indians	<i>Pauma Valley, CA</i>
Mesa Grande Band of Mission Indians	<i>Santa Ysabel, CA</i>
Middletown Rancheria of Pomo Indians of California	<i>Middletown, CA</i>
Native American Environmental Protection Coalition	<i>Murrieta, CA</i>
Northern Circle Indian Housing Authority	<i>Ukiah, CA</i>
San Pasqual Band of Indians	<i>Valley Center, CA</i>
Soboba Band of Luiseno Indians	<i>San Jacinto, CA</i>
Timbisha Shoshone Tribe	<i>Bishop, CA</i>

Cities

City of Chula Vista	<i>San Diego County, CA</i>
City of Imperial Beach	<i>San Diego County, CA</i>
City of Long Beach (2nd District)	<i>Los Angeles County, CA</i>
City of Oakland	<i>Alameda County, CA</i>
City of Paramount	<i>Los Angeles County, CA</i>
City of Pomona	<i>Los Angeles County, CA</i>
City of Richmond	<i>Contra Costa County, CA</i>
City of San Diego	<i>San Diego County, CA</i>
City of San Jose	<i>Santa Clara County, CA</i>

Advocacy Organizations and Community Partners

Brightline Defense Project	<i>San Francisco, CA</i>
California Community Choice Association	<i>Concord, CA</i>
Cleantech San Diego	<i>San Diego, CA</i>
Climate Action Campaign	<i>San Diego/Orange County, CA</i>
Community Housing Improvement Program	<i>Chico, CA</i>
Local Government Commission	<i>Sacramento, CA</i>
Local Government Sustainable Energy Coalition	<i>Sacramento, CA</i>
NeighborWorks Homeownership Center Sacramento Region	<i>Sacramento, CA</i>
North Valley Community Foundation	<i>Chico, CA</i>
Rebuild North Bay Foundation	<i>Sonoma, CA</i>
Rebuild Paradise Foundation	<i>Chico, CA</i>
Solar Energy Industries Association	<i>Washington, DC</i>
Sullivan Solar Power	<i>San Diego, CA</i>
United Way of California	<i>Chico, CA</i>
Vote Solar	<i>Oakland, CA</i>

SASH Participants and DAC-SASH Applicants

Al Gerard Lejarde	<i>Escondido, CA</i>
Amberosia Vivar	<i>San Diego, CA</i>
Bennie Nelson	<i>National City, CA</i>
Jacqueline Jackson	<i>San Diego, CA</i>
Janice Meyer	<i>Warner Springs, CA</i>
Jeanette Roy	<i>San Diego, CA</i>
Mary Otero & Abraham Gonzalez	<i>San Diego, CA</i>

ALL MISSION INDIAN HOUSING AUTHORITY

◆ 27368 Via Industria, Suite 113, Temecula, CA 92590 ◆



January 15, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of All Mission Indian Housing Authority (AMIHA), I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

AMIHA currently serves as the Tribally Designated Housing Entity (TDHE) for fourteen (14) Southern California Indian Tribes. Our consortium includes Agua Caliente, Cabazon, Cahuilla, Jamul, La Jolla, Morongo, Pauma, Pechanga, Santa Rosa, Santa Ynez, Soboba, Torres-Martinez, Twenty-Nine Palms, and Viejas. AMIHA provides differing types of services to these tribes based on their housing needs and direction from tribal leaderships. AMIHA was founded in 1970 with the purpose of providing affordable, low income housing to the Tribal Members. AMIHA serves 14 reservations in 3 counties. To date, AMIHA has built more than 1,000 housing units in San Diego, Riverside, and Santa Barbara counties.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV-solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

AMIHA strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,



Dave Shaffer
Executive Director

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf



February 1st, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the Bear River Band of the Rohnerville Rancheria, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Bear River Rancheria is located in northern coastal California and is a rural, disadvantaged community with a 50% unemployment rate. Residents had benefitted from some solar installations

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

through GRID Alternatives in the past, and during 2019, I conducted outreach and had many residents sign up for free solar panels, only to learn in July that the Tribe would no longer be eligible.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Bear River Band of the Rohnerville Rancheria strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

Sarah Stawasz

Environmental and Natural Resources Interim Director

Bear River Band of the Rohnerville Rancheria

266 Keisner Drive | Loleta, CA 95551

Phone 707-733-1900 X119 | Email sarahstawasz@brb-nsn.gov

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_202019-02-21.docx.pdf.



BISHOP TRIBAL COUNCIL

January 7, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the Bishop Paiute Tribe I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program. The Bishop Paiute Tribe is a federally recognized Tribe, governed by a Tribal Council of five Tribal Members who are elected by Tribal Members/General Council. The 875-acre Bishop Paiute Reservation was established in 1936 and has a population of approximately 1,651. The Bishop Paiute Tribe, guided by a strategic energy plan, is dedicated to improving energy efficiency and implementing renewable energy on the Reservation, and lessening impacts on global climate change. This dedication is a reflection on the Tribe's commitment to self-sufficiency and protection of the environment.

Affordable energy and the production of our own energy will build economic and social self-sufficiency and sovereignty at the Bishop Tribe. Through a current partnership with GRID Alternatives, the Tribe has a goal to incorporate solar electric systems on its 400 single family residential buildings pending availability of funding that has historically been through CA SASH avenue mechanisms in partnership with federal funding sources (DOE Office of Indian Energy). For the past nine years, through a partnership between the Tribe and GRID, a total of 163 solar electric systems totaling 546kW, have been installed on residences on the Reservation. The systems have displaced 30 to 75 percent or more of each homes' electricity use while helping the

low-income families save money on their electricity bills, allowing them to make ends meet. Since project inception GRID through SASH has trained 60 Bishop tribal members totaling 2,600 manhours of on-the-roof training.

The decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. With the fact of local CA electric rates in our region being among the highest in the nation juxtaposed against a median household income of \$23,362, and bearing an unemployment rate of 23% (2009 Tribal Census); with 34% of households below poverty rate (2009 Dept of Health and Human Services); and 81% below 2009 HUD Low Income Guidelines; it is clear that members of our community experience disproportionate high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals

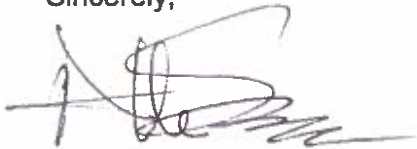
¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² CPUC Environmental and Social Justice Action Plan, p.9
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf.

of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

The Bishop Paiute Tribe strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal flourish extending to the right.

Allen Summers, Sr.
Tribal Chairman
Bishop Paiute Tribe

CC: Gloriana M. Bailey, MBA, Tribal Administrator
 Steven Orihuela, COO II, Bishop Paiute Tribe
 Tribal Environmental Protection Agency, Bishop Paiute Tribe
 Brian Adkins, Environmental Director, Bishop Paiute Tribe



Campo Band of Mission Indians

Chairman Harry P. Cuero Jr.
Vice-Chairwoman Kerm Shipp
Secretary Mary Johnson
Treasurer Marcus Cuero
Committee Brian Connolly Sr.
Committee Steven M. Cuero
Committee Benjamin Dyché

December 09, 2019

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Campo Band of Mission Indians, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV-solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

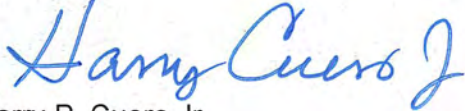
Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands. In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

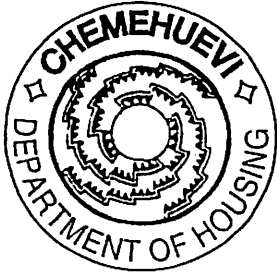
We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Campo Band of Mission Indians strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

A handwritten signature in blue ink that reads "Harry Cuero Jr." The signature is fluid and cursive, with the first name "Harry" and last name "Cuero" being more prominent, and "Jr." written in smaller script at the end.

Harry P. Cuero Jr.
Tribal Chairman
Campo Band of Mission Indians



Chemehuevi Department of Housing

P.O. Box 1889
1980 Valley Mesa Road
Havasupai Lake, CA 92363
PH. (760) 858-4564 FAX (760) 858-5205

April 17, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Chemehuevi Indian Tribe, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Chemehuevi Indian Reservation was established in 1907, lands consist of 30,654 acres, including 27 miles of shoreline along the western shore of Havasu Lake, located in the Chemehuevi Valley, San Bernardino County, CA. The Tribe is federally recognized and governed by a Tribal Council of 9 Tribal Members who are elected by Tribal Members. Current membership is 1,208 less than 200 reside on the reservation. The average income was \$30,685 with an unemployment rate of 18%. The Tribe strives for both self-sufficiency and protection of the environment. Long term goals would include the production of our own energy to help build economic self-sufficiency and sovereignty.

We have been pleased to work in recent years with GRID Alternatives and the Single-family Affordable Solar Homes (SASH) Program to bring solar energy and job training opportunities to our Native American community. The SASH Program has provided opportunities for our tribe's members to receive money-saving energy efficiency services and solar electrical systems, and learn first-hand about solar technologies. The solar electrical systems save low-income tribal families money each month on their utility costs, and have helped our tribe work toward its environmental and clean energy goals, and increased residents' pride in our reservation. The solar electric systems have been able to benefit our tribal members financially because of the strong net energy metering policy in California. Tribal members get compensated for the energy they produce each month and are incentivized to use only what they need.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV-solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency

programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

The Tribe is located in Havasu Lake, California. Havasu Lake is located in the low desert of San Bernardino County at the border of Arizona. The Tribe experiences extreme high temperatures for most of the year. Many of the tribal residents cannot afford to own and operate air conditioners, due to the high cost of electricity. Many elders and other tribal members retreat to the community-cooling center, leave their homes during the summer, or sadly simply endure the harsh weather conditions inside their homes. The savings from the solar systems will enable homeowners to be more comfortable in their homes.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

The Chemehuevi Indian Tribe strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Lorrie Ellsworth". The signature is fluid and cursive, with the first name "Lorrie" being more prominent than the last name "Ellsworth".

Lorrie Ellsworth
Housing Executive Director



GUIDIVILLE

Indian Rancheria

P.O. BOX 339 • TALMAGE, CA 95481 • PH: 707/462-3682 • FAX: 707/462-9183

December 9, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Guidiville Rancheria, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-Family Solar Homes (DAC-SASH) program.

The Guidiville Rancheria is a small tribe with a population of 158 members with 20 houses on the residential housing tract on 42.35 acres of trust land located in Mendocino County. The majority of those tribal members living off reservation reside in the adjacent township of Ukiah and Talmage.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV-solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in California.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

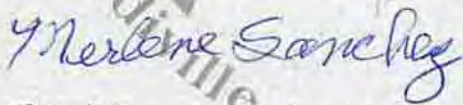
Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - California tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens and would benefit greatly from gaining access to solar through DAC-SASH. Guidiville Rancheria employment opportunities on the tribal lands are minimal. The tribal lands are used for housing, recreation, gardening, and firewood gathering. Although, some of the members are employed full or part-time at the tribal offices and others work in Ukiah or for other local employers. The Guidiville Rancheria utilizes programs like this to help maintain our tribal members ability to live and thrive on the tribal lands.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of disadvantaged communities, which includes all tribal lands.² In addition, tribal lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience Budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, California tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Guidiville Rancheria strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,



Merlene Sanchez
Tribal Chairperson

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

Fred Nelson Jr.
Chairman

Wendy Schlater
Vice Chairman

Angela Miner
Secretary



LA JOLLA BAND OF LUISEÑO INDIANS

22000 HWY 76 | Pauma Valley | CA | 92061

Phone: (760) 742-3771 | Fax (760) 742-1704

Norma Contreras
Treasurer

William C. Nelson II
Council Member

December 10, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of La Jolla Band of Luiseño Indians, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Band is a federally recognized tribe according to the Federal Register, Vol. 84, No. 22, dated February 1, 2019. The Band's reservation is located in Northern San Diego County, at the base of Palomar Mountain, and consists of 8,822 acres of land. The Band is generally considered to be disadvantaged based on the American Community Survey data.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining

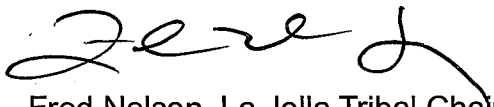
access to solar through DAC-SASH. The previous SASH program was very beneficial to La Jolla tribal members and 43 photovoltaic systems totaling 176.81 AC kW were installed with an estimated energy value of \$1,651,660 over the lifespan of the systems. Unfortunately, we are no longer eligible for renewable energy assistance under the current DAC SASH program parameters.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands. In addition, Tribal Lands have also been included as qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

The La Jolla Band of Luiseño Indians strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Nelson", with a stylized flourish at the end.

Fred Nelson, La Jolla Tribal Chairman



MESA GRANDE BAND OF MISSION INDIANS

P.O. BOX 270

SANTA YSABEL, CALIFORNIA 92070

(760)782-3818 Tribal Office (760) 782-0795 Tribal Fax#

www.mesagrandeband-nsn.gov

January 6, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the Mesa Grande Band of Mission Indians, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our area of San Diego County who have high energy burdens and would benefit greatly from the program. The Mesa Grande Band of Mission Indians are located in a remote part of North San Diego County, the Santa Ysabel area and are totally dependent on electricity only, therefore the use of solar on our homes provides the opportunity for families to stay in their homes and not have to be relocated to another town/city during disasters, climate change, etc.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the

extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in the Santa Ysabel area of Noryth San Diego County to participate in DAC-SASH..

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition. GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in the Santa Ysabel, County of San Diego should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

A handwritten signature in black ink, appearing to read "M. J. Linton".

Michael J. Linton

Tribal Chairman

Mesa Grande Band of Mission Indians



December 18, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Middletown Rancheria of Pomo Indians of California, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Tribe is headquartered in Middletown, on federal Tribal Trust lands in Lake County, California. The federally recognized Middletown Rancheria of Pomo Indians of California was established after the purchase of 108.7 acres of land in July of 1910. Once the Middletown Rancheria ("Rancheria") was established, members of other Tribal groups such as the Pomo, Wappo, and Wintun joined the Tribe, initially comprised of five families, through marriage or customary adoption. Tribal membership includes 135 recognized adults and 103 recognized minor children. Approximately 25 families reside on the Rancheria and the remaining Tribal Members reside in Middletown, the Lake County area, and elsewhere throughout California and across the United States. The Tribal Council is comprised of five elected officials voted into office by General Council members for three-year terms. The Tribal Council oversees Tribal enterprises and administration of the Tribal government by implementing ordinances and adopting resolutions consistent with the Constitution to govern the conduct of the members and other persons within Tribal jurisdiction. Since 2002, the Tribe has owned and operated the Mount St. Helena Brewing Co., a micro-brewery and restaurant located in Middletown. The Tribe also owns and operates the Twin Pine Casino & Hotel Event Center. This facility supports Tribal health, housing, disability, Elder, and education assistance programs.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands. In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Middletown Rancheria of Pomo Indians of California strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,



Sally Peterson

Tribal Council Vice Chairwoman

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf



Native American Environmental Protection Coalition

www.naepc.com

Jill Sherman-Warne, Executive Director
John D. Beresford, President
Miguel Hernandez, Vice President
Shasta Gaughen, Secretary
Sam Elliot, Treasurer
Nicolette Jonkhaffz, At Large Rep
Kelcey Strickler, At-Large Rep
Melody Sees, At-Large Rep

41185 Golden Gate Circle Suite 209
Murrieta CA 92562
Phone: (951) 296-5595 • Fax: (951) 894-5202
naepc@naepc.com

January 7, 2020

Martha Guzman Aceves, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco CA 94102

Re: Support for Modification of D.18.06.027 (DAC-SASH Program) Presented by GRID Alternatives

Dear Commissioner Guzman Aceves,

I am writing to express our unconditional support for GRID Alternatives Petition requesting modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-Solar Homes (DAC-SASH Program).

The Native American Environmental Protection Coalition (NAEPC) is a non-profit 501(c)(3) tribal organization formed, directed and guided by tribes devoted to strengthening tribal sovereignty and building tribal capacity for managing and directing their tribal environmental resources and programs. The mission of NAEPC is to provide technical assistance, environmental education, professional training, information networking and inter-tribal coordination to its members tribes and when possible to non-member tribes. Our member tribes are committed.

The CalEnviroScreen (CES) completely overlooks the poverty that exists on most of the reservations with California. This means nearly and entire tribal population of disadvantaged communities is missing. As a result, access to job training and work force development initiatives and energy efficient programs is denied to tribal lands within California.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based upon the top 25% most disadvantaged census tracts in the CES and an income limited based on the limits in the CA Alternative Rates Energy (CARE) program (200% Federal Poverty Limit.)

Because of the geographic structure of the CES and its reliance on census tracts-areas of land with population numbers that do not account for tribal structure and tribal populations results in

Bear River Rohnerville Rancheria • Cahuilla Band of Indians • Campo Kumeyaay Nation • Chemehuevi Indian Tribe • Hoopa Valley Tribe • Jamul Indian Village • La Jolla Band of Luiseño Indians • La Posta Band of Mission Indians • Los Coyotes Band of Cahuilla Indians • Pala Band of Mission Indians • Pauma Band of Luiseño Indians • Pechanga Band of Luiseño Indians • Manzanita Band of the Kumeyaay Nation • Moapa Band of Paiutes • Morongo Band of Mission Indians • Ramona Band of Cahuilla Indians • Rincon Band of Luiseño Indians • San Pasqual Band of Indians • Santa Clara Pueblo • Santa Rosa Band of Cahuilla Indians • Santa Ynez Band Chumash Indians • Lipay Nation of Santa Ysabel • Soboba Band of Luiseño Indians • Sycuan Band of Kumeyaay • Viejas Band of Kumeyaay Indians

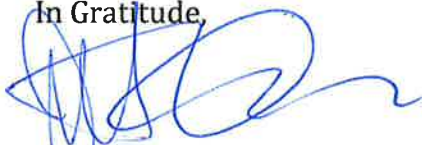
California Tribes being categorically excluded from the CES. This is a grave environmental justice issue and is inequitable.

Geographic qualifying areas must be expanded to include all tribal lands as is requested by GRID Alternatives Petition. Members of the tribal community experience high energy burdens and would greatly benefit by gaining access to solar through DAC SASH. My parents who live in Humboldt County on the Hoopa Indian Reservation spend nearly 35% of their meager social security income on energy. Yet they are the very individuals excluded from participating. On the Yurok Indian Reservation located in Humboldt and Del Norte County an average family of 4 is living on less than \$25,000 per year.

We are pleased that the CPUC has taken efforts to develop a plan to establish a broader and more equitable definition of Disadvantage Communities, which includes all tribal lands. Additionally we applaud the CPUC including tribal lands as qualifying communities in the Equity and Resilience Budget for the Self-Generation Incentive Program. DAC SASH can be paired with the SGIP to increase resilience for tribal communities.

NAEPC fully supports CPUC approval of the GRID Alternatives Petition and we appreciate the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

In Gratitude,



Jill Sherman-Warne
Executive Director



NORTHERN CIRCLE
Indian Housing Authority

694 Pinoleville Dr. • Ukiah, Calif. 95482 • 707-468-1336
Fax 707-468-5615

December 14, 2019

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Northern Circle Indian Housing Authority, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Northern Circle Indian Housing Authority is a Tribally Designated Housing Entity that works on behalf of 7 Federally Recognized Tribes in Northern California (Hopland Band of Pomo Indians, Manchester Band of Pomo Indians, Sherwood Valley Band of Pomo Indians, Redwood Valley Little River Band of Pomo Indians, Guidiville Indian Rancheria, Tyme Maidu Tribe of Berry Creek Rancheria and Mooretown Rancheria of Maidu Indians). Our mission at NCIHA is:

"To help Tribal Governments with the development of their communities. To do so in a way that is consistent with the Tribes' social, cultural and economic values. To alleviate some of the effects of poverty by providing quality housing for Native Americans in Northern California"

In years past, NCIHA has worked with GRID Alternatives to install 53 solar systems totaling 177 AC kilowatts of solar energy with an estimated \$1,540,271 lifetime savings and 2859 tons of carbon not being emitted. Our goal, in our continued relationship with GRID Alternatives, is to significantly increase these numbers until solar is installed on all eligible households within our Tribal Communities.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is **inequitable**, and **untenable**, and that the geographic qualifying areas of the program **should be expanded to include all tribal lands**, as the PFM requests. With high rates of unemployment and high costs of living within the two counties that our Tribes reside, members of our community experience expensive energy burdens and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Northern Circle Indian Housing Authority strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,



Brian Yopez, Board of Commissioners Chairman
Northern Circle Indian Housing Authority

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf



SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

January 21, 2020

TRIBAL COUNCIL

Stephen W. Cope
Chairman

Justin Quis Quis
Vice Chairman

Tilda M. Green
Secretary-Treasurer

David L. Toler
Councilman

Joe Chavez
Councilman

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027
(DAC-SASH program)**

Dear Commissioner Guzman Aceves:

On behalf of the Sa Pasqual Band of Indians I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The San Pasqual Band of Mission Indians Reservation was established by Presidential decree in 1910 and is located in northeastern San Diego County, California, near Valley Center. The Reservation encompasses approximately 3,500 acre and is considered a "checkerboard" board Reservation, as it does not occupy on continuous land mass. The San Pasqual Reservation is divided up into three non-continuous districts: A, B and C.

Tribal Membership consists of approximately 800 people. The Reservation population is approximately 1600 total residents, occupying 400 homes.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.


¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² CPUC Environmental and Social Justice Action Plan, p.9
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

Commissioner Martha Guzman Aceves
California Public Utilities Commission
January 28, 2020
Page 3 of 3

San Pasqual Band of Indians strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Respectfully,


Stephen W. Cope
Chairman
San Pasqual Band of Indians



SOBOBA BAND OF LUISEÑO INDIANS

EXECUTIVE OFFICES OF THE TRIBAL COUNCIL

January 8, 2020

Chairman
Scott Cozart

Vice-Chair
Isaiah Vivanco

Secretary
Monica Herrera

Treasurer
Kelli Hurtado

Sergeant at Arms
Rose Salgado

Executive Assistant
to the Tribal Council
Dione Kitchen

Tribal Administrator
Michael Castello

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027
(DAC-SASH program)**

Dear Commissioner Guzman Aceves:

On behalf of Soboba Band of Luiseño Indians, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Since time immemorial, the descendants of the Soboba people are those who have lived on and occupied the land that is presently known as the cities of San Jacinto, Hemet, Valle Vista and Winchester. Today, the Reservation consists of over 7,000 acres of land that is utilized for both residential and commercial use. The Soboba Band has a current enrollment of approximately 1,200 tribal members who are governed by an elected tribal council that consists of 5 tribal members.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

23906 Soboba Rd
San Jacinto, CA 92583

Mailing Address
P.O. Box 487
San Jacinto, CA 92581



SOBOBA BAND OF LUISEÑO INDIANS

EXECUTIVE OFFICES OF THE TRIBAL COUNCIL

Chairman
Scott Cozart

Vice-Chair
Isaiah Vivanco

Secretary
Monica Herrera

Treasurer
Kelli Hurtado

Sergeant at Arms
Rose Salgado

Executive Assistant
to the Tribal Council
Dione Kitchen

Tribal Administrator
Michael Castello

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Soboba strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

Scott Cozart, Chairman

² CPUC Environmental and Social Justice Action Plan, p.9
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

23906 Soboba Rd
San Jacinto, CA 92583

Mailing Address
P.O. Box 487
San Jacinto, CA 92581



Timbisha Shoshone Tribe

December 4, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the Timbisha Shoshone Tribe, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Timbisha Shoshone Tribe is a small tribe (400 members) and is located in Death Valley National Park. The majority of the Tribal elders reside in this area where the daytime temperatures reach 120 plus degrees for several months a year and alternate sources for electrical power are crucial to keeping their utility costs reasonable.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV- solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA.

D.18-06-027 defined the eligibility parameters for DAC SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.



and, an income limit based on the limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL).

Because of the geographic structure of the CES and its reliance on census tracts - areas of land with population numbers that do not account for tribal structure and tribal populations - CA tribes are categorically excluded from the CES. We believe this is inequitable, and untenable, and that the geographic qualifying areas of the program should be expanded to include all tribal lands, as the PFM requests. Members of our community experience high energy burdens, and would benefit greatly from gaining access to solar through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has undertaken an extensive effort to develop an Environmental and Social Justice Action Plan (ESJ Action Plan), establishing a broader, more equitable definition of Disadvantaged Communities, which includes all Tribal Lands.² In addition, Tribal Lands have also been included as a qualifying communities in the CPUC's recent Equity and Resilience budget (ERB) for the Self-Generation Incentive Program (SGIP). Given DAC SASH can be paired with SGIP, additional opportunities exist for tribal communities to increase resilience if they can access these investments and complementary technologies with broad benefits.

We appreciate the Commission's recognition in the ESJ Plan and SGIP ERB of the myriad of issues faced by tribal communities and the importance of including them in the state's renewable energy investments. In the face of wildfires, power shutoffs, and climate change, CA tribes should not be shut out of DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

The Timbisha Shoshone Tribe strongly supports approval of GRID Alternatives' PFM of D.18-06-027 and appreciates the Commission's leadership on ensuring equity in its programming for disadvantaged communities.

Sincerely,

A handwritten signature in blue ink, reading "W.D.K.", followed by a large, stylized flourish.

White Dove Kennedy

Tribal Chairperson

² CPUC Environmental and Social Justice Action Plan. p9



CONSERVATION SECTION
ECONOMIC DEVELOPMENT DEPARTMENT

12/10/2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of The City of Chula Vista, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The City of Chula Vista is located at the center of one of the richest cultural, economic and environmentally diverse zones in the United States. It is the second-largest City in San Diego County with a population of 268,000. Chula Vista boasts more than 52 square miles of coastal landscape, canyons, rolling hills, mountains, quality parks, and miles of trails. Chula Vista is a leader in conservation and renewable energy and has been named one of the top safest cities in the country.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our City who have high energy burdens and would benefit greatly from the program. Greenhouse

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

gas emissions from the electrical sector represent the second largest source of emissions in our community and City Council has adopted a goal for 100% renewable energy by 2035.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

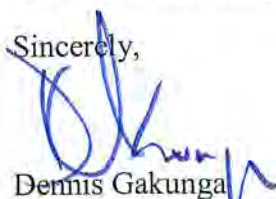
The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in our City to participate in DAC-SASH..

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in our City should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,



Dennis Gakunga
Chief Sustainability Officer
DGakunga@chulavistaca.gov
619-476-5355

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf



City of Imperial Beach, California

OFFICE OF COUNCILMEMBER MARK WEST

825 Imperial Beach Blvd., Imperial Beach, CA 91932 Tel: (619) 423-8615 Fax: (619) 628-1395

December 16, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

As Councilmember of the City of Imperial Beach, I write to express my strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen and an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our city who have high energy burdens and would benefit greatly from the program.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short and does not allow sufficient opportunity for disadvantaged communities in Imperial Beach to participate in DAC-SASH.

Commissioner Martha Guzman Aceves

Support GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

December 16, 2019

Page 2

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition. GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in Imperial Beach should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

I strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and I appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

A handwritten signature in black ink, appearing to read 'MBA', written over a horizontal line.

Mark B. West
Councilmember



January 15, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Councilwoman Jeannine Pearce, 2nd District, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Second District is the heart of the city of Long Beach. It encompasses from the Port of Long Beach, Downtown, up to 10th Street. Our district is divided into a life expectancy of 7 years within just two blocks. It is critical in our district that we provide resources that enhance a good quality of life for all residents. It is through providing incentives and guiding them through processes that will allow residents to benefit the resources at its fullest.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our Second District who have high energy burdens and would benefit greatly from the program. Many home owners

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

do not have the monetary means or accessibility to make their homes more efficient, causing them a cost-burden in their bills.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in our Second District to participate in DAC-SASH.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in our Second District should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

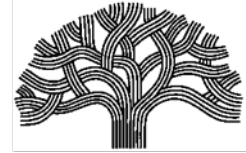
Sincerely,

Jeannine Pearce, *Councilwoman*
City of Long Beach, 2nd District

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

CITY OF OAKLAND



1 FRANK H. OGAWA PLAZA • 3RD FLOOR • OAKLAND, CALIFORNIA 94612

Office of the Mayor
Libby Schaaf
Mayor

(510) 238-3141
FAX: (510) 238-4731
TDD: (510) 238-3254

December 10, 2019

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

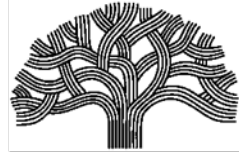
On behalf of the City of Oakland, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The City of Oakland – one of the most diverse cities in the US – has long been known as a climate leader. Our City is also at the forefront of climate equity work. We are currently crafting an equity-first approach to addressing the climate crisis through our 2030 *Equitable Climate Action Plan*, which envisions a strategy toward deep decarbonization in every sector, prioritizing reduced utility bills, improved housing security, cleaner air, and good green job pathways in frontline communities. Regional and State programs like DAC-SASH are critical tools in our toolbox that help us reach our ambitious goals.

Decision 18-06-027 established DAC-SASH, which aims to increase access to PV technologies for low-income homeowners in disadvantaged communities (DACs). It also provides job training and workforce development initiatives, integration with energy efficiency programs, and robust consumer protection measures. DAC-SASH is largely modeled off California's existing SASH program that has operated since 2009. Because DAC-SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities now exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

In D.18-06-027, the Commission defined the eligibility parameters for DAC-SASH: a geographic designation based on the CalEnviroScreen (CES)¹ top 25% most disadvantaged census tracts, and an income limit based on the statewide limits in the California Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, these geographic and income

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.



parameters program exclude many Oakland families who have high energy burdens and would benefit greatly from the program. As you are likely aware, Oakland is a city plagued by wealth inequality; health and wellbeing outcomes are widely divergent across racial and geographic lines. Oakland also sits in the heart of the Bay Area, where, like the surrounding region, we absorb families who are priced out of Silicon Valley and San Francisco. The cost of living has therefore increased dramatically, leading to a proportionate increase in relative poverty.

The DAC-SASH program's current income limits ignore the realities of who can access needed resources, who can stay rooted in their homes, and who lives day-to-day on the brink. By using the 200% FPL threshold, it unfairly excludes low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego.

We support the PFM because it would change the income eligibility for DAC-SASH to 80% AMI: a threshold commonly used for impactful, means-tested housing and other programs. The 80% AMI definition is grounded in statute. It models the current SASH program, and equitably addresses the wide cost-of-living variability across our state. The PFM will correct the current imbalance and put low-income households throughout California's DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns with the ESJ Action Plan's broader perspective on disadvantaged communities. The changes requested will support the effort to bring more equity to communities who are on the forefront of the climate crisis and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in Oakland and throughout California should not be excluded from DAC-SASH. They should be allowed to participate so that they can realize the enhanced resiliency, local power, and economic co-benefits that DAC-SASH can help create.

We ask that you support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Libby Schaaf', with a large, stylized flourish at the end.

Mayor Libby Schaaf
City of Oakland

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_202019-02-21.docx.pdf.



City Manager
(562) 220-2225

January 14, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the City of Paramount, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program. The City of Paramount is a jurisdiction of approximately 56,000 residents located in the Gateway Cities region of Southeast Los Angeles County

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within Paramount who have high energy burdens and would benefit greatly from the program. As we aim to meet the need for renewable energy sources and bring a true sense of energy equity to the deserving residents of Paramount,

we strongly support changes to income eligibility. We make it a point to promote the mission of GRID Alternatives through City social media and other platforms, and the response from residents is highly positive in terms of numbers of viewers, shared postings, and comments.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in our city to participate in DAC-SASH.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition. GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in our city should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

CITY OF PARAMOUNT



John Moreno
City Manager

TIM SANDOVAL
Mayor

OFFICE OF THE MAYOR



January 21, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the City of Pomona, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Pomona is the seventh largest city in Los Angeles County, with a population of over 151,000 residents. Much of Pomona falls within the Disadvantaged Communities criteria and the rate of homeownership is roughly 50%, but is vulnerable to fall lower. Decision 18-06-027 established the DAC-SASH program, which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within City of Pomona who have high energy burdens and would benefit greatly from the program.

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in City of Pomona to participate in DAC-SASH.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in City of Pomona should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,



Tim Sandoval
Mayor

² CPUC Environmental and Social Justice Action Plan, p.9
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf.



January 30, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the City of Richmond, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The City of Richmond has developed a partnership with the GRID Alternatives Energy for All program over the last ten years, and has successfully solarized 500 low-income local households. The City supports the partnership by:

- 1) Contributing funding to provide additional solar and electrical panel funding and close any funding gaps for residents.
- 2) Organizing campaigns and sign-up events.
- 3) Funding roof repairs for participating households that are unable to install solar because of poor roof condition.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the

CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our city who have high energy burdens and would benefit greatly from the program. We want to continue our progress to serve as many households with services and feel that the eligibility parameters increase the cost of delivering that service.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bring more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in our city should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,



Adam Lenz

Environmental Services Manager
City of Richmond, CA

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

December 13, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the City of San Diego, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (D.18-06-027) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program. The City is the second largest in the State and we continue working to identify and partner with our disadvantaged communities, or what we refer to as Communities of Concern in the City.

D.18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in Communities of Concern, and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC-SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

With D.18-06-027, the Commission defined the eligibility parameters for DAC-SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES) and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our Communities of Concern who have high energy burdens and would benefit greatly from the program. San Diego recently conducted our own climate equity assessment and identified over 615,000 San Diegans who would greatly benefit from the DAC-SASH program, but due to the geographic limitations, only a few thousand are eligible within the City.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in our Communities of Concern to be categorically excluded from DAC-SASH because of the 200% FPL

being used. The PFM will correct this and put low-income households throughout California's disadvantaged communities, and San Diego's Communities of Concern, on an even playing field to qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for Communities of Concern to participate in DAC-SASH.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in Communities of Concern in our City should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,



Cody Hooven
Director and Chief Sustainability Officer
City of San Diego

January 6, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves,

On behalf of the City of San José, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the DAC-SASH program.

The eligibility parameters for DAC-SASH exclude many families within San José who have high energy burdens and would otherwise benefit from the program. The City of San José has expressed concerns in the past with the criteria used for CalEnviroScreen 3.0, which fails to take into account the poverty in many Bay Area communities and our Communities of Concern. In fact, eight San José census tracts lost DAC designation between version 2.0 and version 3.0 of CalEnviroScreen, yet, our communities continue to struggle with the region's high cost of living. The DAC-SASH program's current income limit will continue to disproportionately exclude low-income families living in San José and increase the clean energy divide.

By changing the income eligibility for DAC-SASH to 80 percent AMI we will ensure that all low-income Californians are accounted for. The 80 percent AMI definition is grounded in statute, models the current SASH program, and addresses the wide variance among cost-of-living in our state. In the face of our state's housing crisis and continual power shutoffs, low-income families residing in DACs in San José should not be excluded from the resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID Alternatives' Petition for Modification because it will create access and opportunity for low-income families in San José and across the State.

Sincerely,



Sam Liccardo
Mayor
City of San José

February 15, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Brightline Defense, I write to express our support for GRID Alternatives' (GRID) Petition for Modification (PFM) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program. Brightline is an environmental justice non-profit that works to empower communities and create sustainable environments. We work to promote sustainable policies, focusing on local hiring policies and access to environmental benefits such as solar and energy efficiency.

The Commission in D.18-06-027 defined the eligibility parameters for DAC-SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters exclude many families with high energy burdens.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% Area Median Income (AMI). The 80% AMI definition is grounded in statute, reflects the SGIP Equity Resilience Budget, and equitably addresses the wide variance of cost-of-living in our state. It is unfair to low-income households residing in DACs in urban parts of the state to be categorically excluded from DAC-SASH because 200% FPL is used, whereas households residing in DACs in lower cost-of-living areas such as the Central Valley or far Northern California would qualify. The PFM will correct this imbalance and put low-income households throughout California DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

The PFM also aims to expand the geographic eligibility of the program beyond the top 25% statewide CES census tracts, allowing tribes, communities in rural areas, and high fire districts to participate. If the current DAC-SASH eligibility thresholds remain as-is, GRID and partners will not be able to bring the benefits of the program to any CA tribes, and the program will fail in SDG&E as there are very few qualifying CES census tracts in that territory.

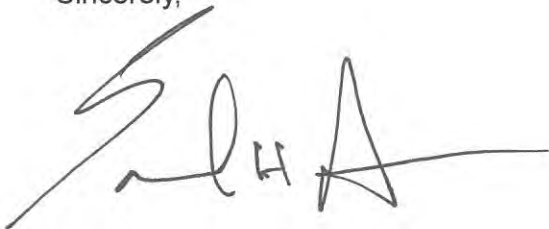
Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on DACs, and will support the effort to bring more equity to communities that are on the forefront of climate change.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs should not be excluded from DAC-SASH, but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Our organization is a party to the Net Energy Metering (NEM) proceeding (R.14-07-002) that created the DAC-SASH program and we have helped shape related NEM programs over time. We fully support this PFM in the context of the NEM proceeding and its stated goals.

We appreciate your leadership to ensure equitable access to solar energy through the DAC-SASH program.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. H. Ahn', with a long horizontal line extending to the right.

Eddie H. Ahn
Executive Director
Brightline Defense

² CPUC Environmental and Social Justice Action Plan, p.9
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf.



February 11, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Commissioner Guzman Aceves,

The California Community Choice Association (CalCCA) submits this letter to the Commission to express support for GRID Alternatives' (GRID) Petition for Modification (PFM) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

CalCCA is a trade association that represents the state's Community Choice Aggregators (CCAs). More than 170 communities (cities, towns, counties) in California are providing CCA service to more than 10 million customers — numbers that will see significant growth in 2020-2021. GRID and CCAs share a common goal of making clean energy and green jobs accessible to underserved communities and have collaborated on several initiatives to advance solar access to low-income customers and communities (list of projects on page 2).

CalCCA agrees with GRID's assertion that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. Changing the income eligibility for DAC-SASH to 80% AMI, as GRID recommends in the PFM, would allow more low-income homeowners to take advantage of solar technologies, better achieving the aims of D.18-06-027.

The 80% AMI definition models the current SASH program and more equitably addresses the extremely wide variance among cost-of-living in California. As it now stands, the DAC-SASH program unfairly excludes low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, and San Diego, for example.

We support GRID's petition for expanding this program because it will include communities that need critical access. We appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

Beth Vaughan
Executive Director, CalCCA



The list below is a brief summary of GRID Alternatives' work with CCAs to date summarized by category.

Low-Income Single-Family and Multifamily Solar

- Gap funding for low-income single-family homes (MCE, Monterey Bay Community Power)
- Gap funding for multifamily affordable housing (MCE)
- Co-marketing for no-cost solar programs (MCE, Sonoma Clean Power, Redwood Coast Energy Authority)

Electric Vehicles

- Funding for free or highly subsidized EVs for community organizations (Sonoma Clean Power, Lancaster Choice Energy)
- Low-income incentives for EVs and free chargers (Sonoma Clean Power)
- Funding for single family & multifamily charging infrastructure (MCE, Redwood Coast Energy Authority)
- Technical assistance for multifamily charging infrastructure (MCE, Peninsula Clean Energy)

Energy Efficiency & Other

- Energy efficiency audits and rebates for multifamily affordable housing (MCE)
- Funding for main service panel upgrades (pending)

Low-Income Community Solar

- Pilot Community Solar FiT project (MCE, San Joaquin test project)
- Advising on Community Solar Policy and partnering on CSD grant (Clean Power Alliance)



January 15, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Community Housing Improvement Program, Incorporated (CHIP), I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

CHIP has developed nearly 2000 affordable, single-family homes for low income households primarily within the rural areas of Butte, Colusa, Glenn, Shasta, Sutter, Tehama, and Yuba Counties. We partner with the USDA Rural Development to provide mutual self-help housing, where our participating families contribute 65% of the labor towards the construction of the homes. We are extremely fortunate to have GRID as a partner. They have dramatically increased long-term affordability for our low-income homeowners by installing solar panels on over 400 of our homes. However, as GRID's eligibility criteria has become more restrictive over the last couple of years, fewer and fewer of our homeowners are eligible for the program.

The California Public Utilities Commission Decision 18-06-027 established the DAC-SASH program which provides access to PV solar systems for low-income homeowners in disadvantaged communities (DACs) and integrates job training and placement, energy efficiency programs and consumer protection. The new program has geographic and income eligibility requirements that excludes many of the families we serve who would benefit greatly from the program. As the program currently stands, it misses the opportunity to help families impacted by California's deadliest wildfire, the 2018 Camp Fire, by both its geographic limitation and its inability to pair solar PV with the State's low-income battery storage program (the Self-Generation Incentive Program, or SGIP).

CHIP supports the PFM because it proposes to change the expand geographic eligibility beyond the statewide CalEnviroScreen, allowing communities in rural areas, high wildfire threat districts, and tribal communities to participate. In this region, high heat events drive up utility costs for families living in our affordable housing communities. We strongly support the PFM proposal to increase income eligibility from 200% FPL to up to 80% Area Median Income (AMI).

**Community Housing
Improvement Program**

1001 Willow Street
Chico, CA 95928

530.891.6931
www.chiphousing.org

888.912.4663 (toll free)
530.896.2261 (TTY)





The PFM will ensure that communities that need critical access to affordable solar and storage will be able to participate. Solar and storage programs, like DAC-SASH and SGIP, which provide direct economic benefit to low-income households is a valuable resource in our region's recovery from the devastating impacts of the 2018 wildfires. We appreciate your consideration towards the needs of rural northern California communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Seana O'Shaughnessy", is written over a light gray horizontal line.

Seana O'Shaughnessy
President/CEO



January 26, 2020

2159 INDIA STREET
SAN DIEGO, CA 92101
858-568-7777

cleantechsandiego.org

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

MISSION:

To accelerate
clean technology
innovation and
the deployment of
smart cities solutions
for the benefit of
the economy and
the environment

Dear Commissioner Guzman Aceves:

On behalf of Cleantech San Diego, please accept this letter as one of strong support for GRID Alternatives' Petition for Modification (PFM) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Cleantech San Diego is a member-based trade organization that positions the greater San Diego region as a global leader in the cleantech economy and smart cities movement. Our members include more than 100 local businesses, universities, governments, and nonprofits committed to advancing sustainable and smart cities solutions for the benefit of the economy and the environment.

Decision 18-06-027 established the DAC-SASH program, which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs, and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program, which has operated since 2009. Given that DAC-SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

In D.18-06-027, the Commission defined the eligibility parameters for DAC-SASH as a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES), and an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within the San Diego region who have high energy burdens and would benefit greatly from the program.

Cleantech San Diego believes that the DAC-SASH program's current income limit disproportionately excludes households living in high-cost-of-living areas in the state. We support the PFM's proposed change to the income eligibility for DAC-SASH to be 80% of the area median income (AMI). The 80% AMI definition is grounded in statute, models the current SASH program, and equitably addresses the extremely wide variance among cost of living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los

Angeles, or San Diego to be categorically excluded from DAC-SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower-cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income household DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition. GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities that are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in the San Diego region should not be excluded from DAC-SASH; rather, they should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Cleantech San Diego strongly supports GRID's PFM for expanding this program and appreciates your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jason Anderson
President and CEO
Cleantech San Diego



January 29, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Climate Action Campaign, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Climate Action Campaign is the leading nonprofit climate watchdog in San Diego and Orange County. Our mission is simple: stop the climate crisis.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within San Diego and Orange County who have high energy burdens and would benefit greatly from the program, and by extension, limiting those communities ability to reach renewable energy targets critical to meeting state and local law.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be

categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in our region to participate in DAC-SASH..

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition. GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in our San Diego and Orange County should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

Matthew Vasilakis
Co-Director of Policy
Climate Action Campaign

April 23, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Electricity Equals Life or (EEL), we write to express our support for GRID Alternatives' (GRID) Petition for Modification (PFM) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

We are a grass roots group of people with disabilities formed in response to PGE's public safety power shut offs. Loss of service to seniors and people with disabilities who must have electricity to survive, threatens our lives and our health. The next fire season is rapidly approaching, and yet there is still no plan in place to address this issue. Individuals, especially those who are low income, cannot solve this by ourselves. Systemic change is essential.

We (EEL) are both a disability and climate justice organization. If the earth is to survive we must stop using fossil fuels. The best solutions to PGE's unreliable, and dangerous grid, are also those that help the planet. The kind of programs administered by GRID Alternatives embody the philosophy of a more just transition off fossil fuels. Because of this, we support their Petition for Modification, despite the shortcomings.

Most state funding to support residential solar programs, including the most recent SGIP Equity Resiliency Budget, (Decision 20-01-021) contain barriers which exclude low income people. Programs designed to include us, such as those administered by GRID Alternatives, are helpful, but limited. The patchwork of programs have gaps and loopholes, making them frustratingly inaccessible to those of us who are low income, on medical baseline, and live in those areas of the state impacted most by the power shut offs. (PSPS).

The current DAC census tract maps do not include vast areas of California impacted by power shutoffs during fire season. This minimal census tract expansion won't be implemented in time for the 2020 fire season. We need better designed programs to address directly the plight of low income seniors and people with disabilities living under the threat of yearly power shut offs. The census tracts included in this expansion do include more of the areas in Tier 3 and 2 HFTD (high hazard fire zones and hence more at risk of power shutoffs) but there are still huge areas of the state where no relief is in sight. We urge you to collaborate with GRID Alternatives and people with disabilities to find better solutions, as soon as possible.

Sincerely,

Marg Hall, Marissa Shaw, Jean Stewart, Peni Hall, and Sheela Gunn-Cushman, on behalf of Electricity Equals Life



Local Government Commission

Leaders for Livable Communities

December 4, 2019

Board of Directors

Councilmember Steve Hansen
Chairman
City of Sacramento

Supervisor Leticia Perez
Vice-Chair
County of Kern

Supervisor Jane Parker
Secretary/ Treasurer
County of Monterey

Mayor Catherine Blakespear
City of Encinitas

Mayor Thomas Butt
City of Richmond

Mayor Pro Tem Miguel Canales
City of Artesia

Councilmember Dominic Farinha
City of Patterson

Councilmember Dan Kalb
City of Oakland

Councilmember Jake Mackenzie
City of Rohnert Park

Supervisor Daron McDaniel
County of Merced

Pam O'Connor
City of Santa Monica

Councilmember Meghan Sahli-Wells
City of Culver City

Councilmember Esmeralda Soria
City of Fresno

Supervisor Das Williams
County of Santa Barbara

Supervisor Mike Wilson
County of Humboldt

Executive Director
Kate Meis

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**RE: Support for GRID Alternatives' Petition for Modification of D.18-06-027
(DAC-SASH program)**

Dear Commissioner Guzman Aceves,

On behalf of the Local Government Commission, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Local Government Commission (LGC) is a nationally recognized non-profit organization with a rich history of connecting leaders, developing policies, and implementing solutions to create livable communities throughout California. With a robust membership network of local elected officials, local government agency staff, and climate change practitioners, LGC operates on the cutting edge of "bottom up" change. LGC led two of the first regional climate change vulnerability assessments in 2010 and have since played a significant role in California's growing climate change adaptation field. Our hallmark programs include the biennial [California Adaptation Forum](#), the [Alliance of Regional Collaboratives for Climate Adaptation](#), and the [Capital Region Climate Readiness Collaborative](#), in addition to numerous place-based climate resilience initiatives throughout the state. LGC also supports a variety of local government energy efficiency, decarbonization, and energy resilience efforts through our [Local Government Sustainable Energy Coalition](#), the [Statewide Energy Efficiency Collaborative](#), and more.

The California Public Utilities Commission Decision 18-06-027 established the DAC-SASH program which provides access to PV solar systems for low-income homeowners in disadvantaged communities (DACs) and integrates job training and placement, energy efficiency programs and consumer protection. The new program has geographic and income eligibility requirements that excludes many families are in the greatest need of the long-term cost savings the State's solar investments can provide.

DAC-SASH misses the opportunity to advance climate resiliency strategies for vulnerable low-income households by both its geographic limitation and its inability to pair solar PV with the State's low-income battery storage program (the Self-Generation Incentive Program, or SGIP).

LGC strongly supports the PFM because it proposes to expand geographic eligibility beyond the statewide CalEnviroScreen disadvantaged census tracts, which would allow more vulnerable northern California communities, high wildfire threat districts, and

tribal communities to participate. We support the PFM proposal to increase income eligibility from 200% FPL to up to 80% Area Median Income (AMI).

The PFM will ensure that communities that need critical access to affordable solar and storage will be able to participate. Solar and storage programs, like DAC-SASH and SGIP, which provide direct economic benefit to low-income households is a valuable resource in every community's toolkit for Climate Adaptation. In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families throughout California should be able to participate in advancing local resiliency, renewable power generation, and the economic co-benefits that DAC-SASH is intended to create. We urge your adoption of the PFM's recommendations, and ensure DAC-SASH meets the needs of all vulnerable California communities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julia Kim', with a stylized, cursive script.

Julia Kim
Senior Project Manager, Climate Change
Local Government Commission
jkim@lgc.org | 916-448-1198 x304



LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

980 9TH Street, #1700 Sacramento, CA 95814 · (916) 448-1198 · www.lgsec.org

Board of Directors

Garrett Wong

LGSEC Board Chair
County of Santa Barbara

Jenny Berg

LGSEC Vice-Chair
BayREN / Metropolitan
Transportation Commission

Kathleen Bryan

City and County of San
Francisco

Marc Costa

The Energy Coalition

Demian Hardman

County of Contra Costa

Lou Jacobson

Eureka City Schools

Kate Meis

Local Government
Commission

Alejandra Tellez

County of Ventura / 3C REN

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the Local Government Sustainable Energy Coalition (LGSEC), I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

LGSEC members include municipalities, regional energy networks (RENs), community choice aggregators (CCA), school districts and civically engaged nonprofits. The Coalition represents 14 cities and 23 counties, which have jurisdiction over almost three-quarters of California's population and reflect two-thirds of the state's electricity demand. LGSEC membership extends to 76 of California's State Assembly districts; 36 of 40 State Senate districts.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our members' jurisdictions and service areas who have high energy burdens and would benefit greatly from the program.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.



LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

980 9TH Street, #1700 Sacramento, CA 95814 · (916) 448-1198 · www.lgsec.org

Board of Directors

Garrett Wong

LGSEC Board Chair
County of Santa Barbara

Jenny Berg

LGSEC Vice-Chair
BayREN / Metropolitan
Transportation Commission

Kathleen Bryan

City and County of San
Francisco

Marc Costa

The Energy Coalition

Demian Hardman

County of Contra Costa

Lou Jacobson

Eureka City Schools

Kate Meis

Local Government
Commission

Alejandra Tellez

County of Ventura / 3C REN

80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in our members' jurisdictions or service areas to participate in DAC-SASH.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in our members' jurisdictions or service areas should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

Garrett Wong
Climate Program Manager, County of Santa Barbara
Board Chair, Local Government Sustainable Energy Coalition

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf



12.16.2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of NeighborWorks Homeownership Center Sacramento Region (NeighborWorks Sacramento), I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

NeighborWorks Sacramento provides low to moderate income families homebuyer education and counseling, financial literacy, affordable housing, down payment assistance and access to healthy fresh food. Our mission is to provide opportunities for successful homeownership and strong communities through quality education, affordable lending, housing development, supportive partnerships and dedicated leadership.

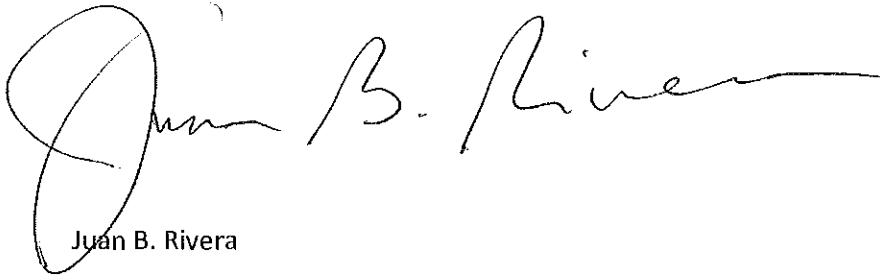
The California Public Utilities Commission Decision 18-06-027 established the DAC-SASH program which provides access to PV solar systems for low-income homeowners in disadvantaged communities (DACs) and integrates job training and placement, energy efficiency programs and consumer protection. The new program has geographic and income eligibility requirements that excludes many families who are in the greatest need of the long-term cost savings the State's solar investments can provide.

As written, DAC-SASH will not be available to support northern California's recovery efforts from devastating impacts of the 2018 fires. By its geographic limitation and inability to pair solar PV with the State's soon-to-launch low-income battery storage program (the Self-Generation Incentive Program, or SGIP), DAC-SASH falls short of helping the majority of our region's wildfire survivors just as rebuilding begins.

NeighborWorks Sacramento strongly supports the PFM in large part because it proposes to expand geographic eligibility beyond the statewide CalEnviroScreen disadvantaged census tracts, which allows vastly more rural northern California communities, high wildfire threat districts, and tribal communities to participate. We also support the PFM proposal to return income qualifications from 200% Federal Poverty Level to up to 80% Area Median Income.

The direct economic benefit of DAC-SASH and SGIP programs is a tremendously valuable resource in our region's recovery. In the face of our region's housing crisis post-wildfire, rising energy prices, high heat events and planned power shutoffs, low-income families residing in rural northern California should not be excluded from the benefits that DAC-SASH is intended to create. Your support for the PFM will help a higher level of equity in renewable energy and resiliency for all low-income families in California.

Sincerely,

A handwritten signature in black ink, reading "Juan B. Rivera". The signature is fluid and cursive, with a large loop at the beginning of the first name.

Juan B. Rivera

President and CEO


NeighborWorks®
HomeOwnership Center
SACRAMENTO REGION



December 2nd, 2019

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the North Valley Community Foundation (NVCF), I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The NVCF has the privilege in serving as the philanthropic lead in the Camp Fire long term recovery effort. We are particularly interested in projects and initiatives that serve the most vulnerable members of our community – those with the least resources and most needs, who have the most challenging time recovering post-disaster. As housing is one of our two main interests at this point in the recovery, this petition particularly caught our eye.

The California Public Utilities Commission Decision 18-06-027 established the DAC-SASH program which provides access to PV solar systems for low-income homeowners in disadvantaged communities (DACs) and integrates job training and placement, energy efficiency programs and consumer protection. The new program has geographic and income eligibility requirements that excludes many families are in the greatest need of the long-term cost savings the State's solar investments can provide.

DAC-SASH misses the opportunity to help families impacted by California's deadliest wildfire, the 2018 Camp Fire, by both its geographic limitation and its inability to pair solar PV with the State's low-income battery storage program (the Self-Generation Incentive Program, or SGIP).

NVCF strongly supports the PFM because it proposes to expand geographic eligibility beyond the statewide CalEnviroScreen disadvantaged census tracts, which would allow vastly more rural northern California communities, high wildfire threat districts, and tribal communities to participate. We support the PFM proposal to increase income eligibility from 200% FPL to up to 80% Area Median Income (AMI).



The PFM will ensure that communities that need critical access to affordable solar and storage will be able to participate. Solar and storage programs, like DAC-SASH and SGIP, which provide direct economic benefit to low-income households is a valuable resource in our region's recovery from the devastating impacts of the 2018 wildfires. In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing throughout California should be able to participate and further resiliency, local power, and economic and community co-benefits that DAC-SASH is intended to create. We appreciate your consideration towards the needs of rural northern California communities.

Sincerely,

A handwritten signature in blue ink, appearing to read "Giovanni Tricerri".

Giovanni Tricerri

Vice President, Regional Recovery & Partnerships
North Valley Community Foundation



February 4, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Rebuild NorthBay Foundation, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Rebuild NorthBay Foundation (RNBF) is a registered 501c4 nonprofit organization born out of the devastating wildfires of October 2017. RNBF is dedicated to the long term post-disaster rebuilding of our public, private and nonprofit communities. We are a team of experienced community and business leaders committed to restoring our community in the four county region of Napa, Sonoma, Lake, and Mendocino Counties. Our vision is to rebuild the North Bay better, safer, greener, and faster. Our Mission is achieved through a focus on Advocacy, Community Impact Projects, and Collaboration to create a more sustainable and resilient community.

We request you please consider the cumulative impacts of our 2017 wildfires, the air pollution generated by the Camp Fire - which we held for two weeks - as well as the emotional devastation. We want you to please consider that last October we had the largest fire on record in Sonoma County combined with our sixth (6) PSPS event of the fire season. We are a region recovering from significant emotional, physical, economic, and environmental trauma. We are struggling to maintain our workforce because of the high cost of housing, the planned power shut-offs, and our recurring disasters. Measuring us by daily air quality and one segment of our population that is wealthy simply does not provide a full and accurate understanding of our issues here.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within our region, in particular Sonoma and Mendocino Counties who have high energy burdens and would benefit greatly from the program.

Solar access and rechargeable energy investment in post-disaster regions, such as Sonoma and Mendocino Counties, builds resiliency and equity. These program funds will be used to help those recovering from disaster and allow us to endure a very long, painful, difficult process. While the national news has departed, our recovery is 7-10 years long, if we are fortunate.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in Sonoma and Mendocino Counties to participate in DAC-SASH..

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

Executive Director
Jennifer Gray Thompson, MPA

Board of Directors:

Board President: Judy Coffey
RN, Senior Consultant, Leap
Solutions; Former Senior Vice
President & Area Manager,
Kaiser Permanente

Michael Mondavi (Exec. Board)
Founder & Coach,
Folio Fine Wine Partners

Larry Florin (Exec. Board)
CEO & President,
Burbank Housing

Henry Hansel (Exec. Board)
President,
Hansel Auto Group

Brian Bottari
Government Affairs Director –
North Bay, Internet Essentials,
Comcast

Jack Buckhorn
Executive Director,
North Bay Labor Council

Lisa Carreno
Executive Director,
United Way Wine Country

Sonu Chandi,
Founder & President,
Chandi Hospitality Group

Robert Eyler, Ph.D.
Dean, School of Extended &
International Education,
Sonoma State University

Reno Franklin
Chairman Emeritus,
Kashia Band of Pomo Indians

Elizabeth Gore
President & Chairwoman, Alice

Jesse Katz
Founder/Winemaker,
Devil Proof Vineyards

Jake Kloberdanz
CEO & Founder, ONEHOPE

Lisa Micheli, Ph.D.
President & CEO,
Pepperwood Preserve

Cynthia Murray,
President & CEO,
North Bay Leadership Council

Michele Rahmn
Community Member

Tara Sharp
Marketing Officer,
Google

Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in Sonoma and Mendocino Counties should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

Jennifer Gray Thompson
Executive Director
Rebuild NorthBay Foundation

Rebuild NorthBay Foundation is a registered 501c3 committed to rebuilding the North Bay region of Napa, Sonoma, Lake and Mendocino Counties better, safer, greener, faster. For more information, please visit www.rebuildnorthbay.org

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf.



Rebuild Paradise Foundation | www.rebuildparadise.org | (530) 864-0825

1058 Mangrove Ave. Suite C Chico, CA 95926

a 501(c)(3) Nonprofit Organization, EIN 834200562

January 28, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of the Rebuild Paradise Foundation I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

The Rebuild Paradise Foundation was formed to provide long-term resources to Butte County's disaster affected residents, businesses and workforce following the Camp Fire of 2018. Solar is one of the many items that people rebuilding have to tackle and we are glad that a partner like Grid Alternatives is serving that need.

The California Public Utilities Commission Decision 18-06-027 established the DAC-SASH program which provides access to PV solar systems for low-income homeowners in disadvantaged communities (DACs) and integrates job training and placement, energy efficiency programs and consumer protection. The new program has geographic and income eligibility requirements that excludes many families are in the greatest need of the long-term cost savings the State's solar investments can provide.

As written, DAC-SASH will not be available to support northern California's recovery efforts from devastating impacts of the 2018 fires. By its geographic limitation and inability to pair solar PV with the State's soon-to-launch low-income battery storage program (the Self-Generation Incentive Program, or SGIP), DAC-SASH falls short of helping the majority of our region's wildfire survivors just as rebuilding begins.

The Rebuild Paradise Foundation strongly supports the PFM in large part because it proposes to expand geographic eligibility beyond the statewide CalEnviroScreen disadvantaged census tracts, which allows vastly more rural northern California communities, high wildfire threat districts, and tribal communities to participate. We also support the PFM proposal to return income qualifications from 200% Federal Poverty Level to up to 80% Area Median Income.

The direct economic benefit of DAC-SASH and SGIP programs is a tremendously valuable resource in our region's recovery. In the face of our region's housing crisis post-wildfire, rising energy prices, high heat events and planned power shutoffs, low-income families residing in rural northern California should not be excluded from the benefits that DAC-SASH is intended to create. Your support for the PFM means equity in renewable energy and resiliency for all low-income families in California.

Sincerely,

Charles Brooks

Executive Director – Rebuild Paradise Foundation



April 21, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: SEIA Support for Petition to Modify of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I write on behalf of the Solar Energy Industries Association (SEIA) to express our strong support for GRID Alternatives' (GRID) Petition for Modification (Petition) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

SEIA is the national trade association for solar companies, representing 1,000+ companies across all market segments. As the national trade association of the U.S. solar energy industry, which now employs more than 260,000 Americans, we represent all organizations that promote, manufacture, install and support the development of solar energy. SEIA works with its member companies to build jobs and diversity, champion the use of cost-competitive solar in America, remove market barriers and educate the public on the benefits of solar.

In July 2018, the Commission established its DAC-SASH program in Decision 18-06-027, with the objective increasing access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), while also providing job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. Further, pairing the DAC-SASH program with the Self-Generation Incentive Program (SGIP)'s new Equity Resilience Budget for energy storage unlocks additional opportunities for low-income households in DACs to increase resilience in their homes.

The eligibility parameters for DAC-SASH were established by the Commission in D.18-06-027 as follows: geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES)¹ and an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Although the Commission's intent was to focus the program on California residents who need it most, unfortunately, the current geographic and income parameters exclude many families with high energy burdens.

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

SEIA is concerned that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas throughout California. SEIA supports the Petition because it proposes to address this issue by changing the income eligibility for DAC-SASH to 80% Area Median Income (AMI). The 80% AMI definition is grounded in statute, reflects the SGIP Equity Resilience Budget, and equitably addresses the wide variance of cost-of-living in our state. It is unfair, and inconsistent with the original intent of the Commission in establishing the program, that low-income households residing in DACs in urban parts of the state are categorically excluded from DAC-SASH because 200% FPL is used, whereas households residing in DACs in lower cost-of-living areas such as the Central Valley or far Northern California would qualify. The Petition will correct this imbalance and put low-income households throughout California DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The Petition also aims to expand the geographic eligibility of the program beyond the top 25% statewide CES census tracts, allowing communities in rural areas and high fire districts, as well as tribes, to participate. Under the current program design, GRID and partners will not be able to bring the benefits of the program to any CA tribes, and the program will fail in SDG&E as there are very few qualifying CES census tracts in that territory.

Since the adoption of D.18-06-027, the Commission established an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's Petition aligns well with the ESJ Action Plan's broader perspective on DACs, and will support the effort to bring more equity to communities that are on the forefront of climate change.

Low-income families residing in DACs should not be excluded from DAC-SASH, but rather, should be allowed to participate and access the resiliency benefits, local power benefits, and economic and community co-benefits that DAC-SASH can help create.

Further, SEIA is a party to the Net Energy Metering (NEM) proceeding (R.14-07-002) that created the DAC-SASH program, and we have been heavily involved in the design of NEM related programs. We fully support this Petition in the context of the NEM proceeding and its stated goals.

We appreciate your leadership to ensure equitable access to solar energy through the DAC-SASH program.

Sincerely,

/s/ Rick Umoff

Senior Director and Counsel, California
Solar Energy Industries Association

² CPUC Environmental and Social Justice Action Plan, p.9

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf



1/29/2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Sullivan Solar Power, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Sullivan Solar Power is a solar installation firm with 16 years of experience in developing both residential and commercial solar power across Southern California.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), and also provides job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. DAC-SASH is largely modeled off the existing SASH program which has operated since 2009 in CA. Given DAC SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity and Resilience Budget, additional opportunities exist for low-income households to increase resilience and have access to complementary technologies with broad benefits.

The Commission in D.18-06-027 defined the eligibility parameters for DAC SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES); and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families within Southern California who have high energy burdens and would benefit greatly from the program

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% AMI. The 80% AMI definition is grounded in statute, models the current SASH program, and moreover, equitably addresses the extremely wide variance among cost-of-living in our state. It is unfair to low-income households residing in disadvantaged communities in the Bay Area, Los Angeles, or San Diego to be categorically excluded from DAC SASH because 200% FPL is used; whereas households residing in disadvantaged communities in lower cost-of-living areas such as the Central Valley or far Northern CA, would qualify. The PFM will correct this imbalance and put low-income households throughout CA DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the statewide CalEnviroScreen map, allowing tribal communities, communities in rural areas, and high fire districts to participate. The current definition of the CalEnviroScreen falls short, and does not allow sufficient opportunity for disadvantaged communities in Southern California to participate in DAC-SASH..

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition. GRID's PFM aligns well with the ESJ Action Plan's broader perspective on disadvantaged communities, and the changes requested will support the effort to bringing more equity to communities who are on the forefront of climate change and require access to state investments toward resiliency.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs in Southern California should not be excluded from DAC-SASH; but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

We strongly support GRID's PFM for expanding this program because it will include communities that need critical access, and we appreciate your leadership to ensure equitable access to solar energy with the DAC-SASH program.

Sincerely,

Daniel Sullivan
Founder & President
Sullivan Solar Power of California, Inc.

1/31/2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of United Way of Northern California, I write to express our strong support for GRID Alternatives' Petition for Modification of Decision 18-06-027 (PFM) to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

Founded in 1953, United Way of Northern California serves nine counties -- Butte, Glenn, Lassen, Modoc, Plumas, Shasta, Siskiyou, Tehama and Trinity. Our mission is to fight for the health, education and financial stability of all residents of our communities. We do that through providing and funding programs that help families make ends meet, collaborating to address homelessness, giving grants to organizations aligned with our mission, and operating the 211 helpline and website in Shasta and Tehama Counties. Our core values revolve around service, inclusion, collaboration, and meeting the community where it needs us.

The California Public Utilities Commission Decision 18-06-027 established the DAC-SASH program, which provides access to Photovoltaic (PV) solar systems for low-income homeowners in disadvantaged communities (DACs) and integrates job training and placement, energy efficiency programs and consumer protection. The new program has geographic and income eligibility requirements that excludes many families who have the greatest need for long-term cost savings available through the State's solar investments.

As written, DAC-SASH does not support northern California's recovery efforts from devastating impacts of the 2018 fires. By its geographic limitation and inability to pair solar PV with the State's soon-to-launch low-income battery storage program (the Self-Generation Incentive Program, or SGIP), DAC-SASH falls short of helping the majority of our region's wildfire survivors just as rebuilding begins.

United Way of Northern California strongly supports Grid Alternatives' proposal to expand geographic eligibility beyond the statewide CalEnviroScreen disadvantaged census tracts, allowing participation of vastly more rural northern California communities, high wildfire threat districts, and tribal communities.

We also support the PFM proposal to return income qualifications from 200% Federal Poverty Level to up to 80% Area Median Income.

The direct economic benefit of DAC-SASH and SGIP programs is a tremendously valuable resource in our region's recovery. In the face of our region's post-wildfire housing crisis, rising energy prices, high heat events and planned power shutoffs, low-income families residing in rural northern California need to have access to benefits that DAC-SASH is intended to create. Your support for the PFM means equity in renewable energy and resiliency for all low-income families in California.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Melody Proebstel', with a stylized flourish at the end.

Melody Proebstel, MSW

Butte/Glenn Regional Director



April 21, 2020

Commissioner Martha Guzman Aceves
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

On behalf of Vote Solar, I write to express our support for GRID Alternatives' (GRID) Petition for Modification (PFM) of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program. Vote Solar is a nonprofit advocacy organization that works across the country to make solar energy more accessible and affordable for more Americans.

Decision 18-06-027 established the DAC-SASH program, aiming to increase access to PV solar technologies for low-income homeowners in disadvantaged communities (DACs), while also providing job training and workforce development initiatives, integration with energy efficiency programs and robust consumer protection measures. Given that DAC-SASH can be paired with the Self-Generation Incentive Program (SGIP)'s new Equity Resilience Budget for energy storage, additional opportunities exist for low-income households in DACs to increase resilience in their homes.

The Commission in D.18-06-027 defined the eligibility parameters for DAC-SASH: a geographic designation based on the top 25% most disadvantaged census tracts in the CalEnviroScreen (CES);¹ and, an income limit based on the statewide limits in the CA Alternate Rates Energy (CARE) program (200% Federal Poverty Limit, or FPL). Unfortunately, the current geographic and income parameters exclude many families with high energy burdens.

We believe that the DAC-SASH program's current income limit disproportionately excludes households living in high cost-of-living areas in the state. We support the PFM because it proposes to change the income eligibility for DAC-SASH to 80% Area Median Income (AMI). The 80% AMI definition is grounded in statute, reflects the SGIP Equity Resilience Budget, and equitably addresses the wide variance of cost-of-living in our state. It is unfair to low-income households residing in DACs in urban parts of the state to be categorically excluded from DAC-

¹ DAC SASH includes the top 25% most disadvantaged census tracts statewide, and census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.

SASH because 200% FPL is used, whereas households residing in DACs in lower cost-of-living areas such as the Central Valley or far Northern California would qualify. The PFM will correct this imbalance and put low-income households throughout California DACs on an even playing field for qualifying for the state's investments through DAC-SASH.

The PFM also aims to expand the geographic eligibility of the program beyond the top 25% statewide CES census tracts, allowing tribes, communities in rural areas, and high fire districts to participate. If the current DAC-SASH eligibility thresholds remain as-is, GRID and partners will not be able to bring the benefits of the program to any CA tribes, and the program will fail in SDG&E as there are very few qualifying CES census tracts in that territory.

Since D.18-06-027 was issued, the CPUC has adopted an Environmental and Social Justice Action Plan (ESJ Action Plan), which includes a broader, more equitable DAC definition.² GRID's PFM aligns well with the ESJ Action Plan's broader perspective on DACs, and will support the effort to bring more equity to communities that are on the forefront of climate change.

In the face of our state's housing crisis, urban displacement, wildfires, power shutoffs, and climate change, low-income families residing in DACs should not be excluded from DAC-SASH, but rather, should be allowed to participate and pursue the goals of resiliency, local power, and economic and community co-benefits that DAC-SASH can help create.

Our organization is a party to the Net Energy Metering (NEM) proceeding (R.14-07-002) that created the DAC-SASH program and we have helped shape related NEM programs over time. We fully support this PFM in the context of the NEM proceeding and its stated goals.

We appreciate your leadership to ensure equitable access to solar energy through the DAC-SASH program.

Sincerely,



Susannah Churchill
California Director, Vote Solar
360 22nd St, Suite 730
Oakland, CA 94612

² CPUC Environmental and Social Justice Action Plan, p.9
https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

January, 15th 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I Al Gerard R. Lejarde write to express my adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

I am a United States Marine Corps. Veteran. I currently work as a veteran peer advocate and employment specialist through the Bob Hope Veteran Support Program with Easter Seals Southern California. My wife is a preschool teacher at The Jewish Community Center Jacobs Family Campus. We work in our respective fields because we are passionate about the missions our organizations perpetuate and are committed to helping those in our communities. Working in the non-profit sector leaves our family with extreme budgetary constraints. Back in 2015, I came home to the joyous news that we were expecting our first child. The stress of providing for our budding young family was felt by myself and my wife. Our current apartment had extreme mold, and my Mother in Law due to health issues was no longer able to live by herself. Through life's blessings we were able to become homeowners through Habitat for Humanity's home ownership program. We joined the Elm Street Community in 2016 which is located in Escondido, California.

When we first arrived to Escondido to take a tour of our future home, we immediately felt comfortable, we could tell that this community is full of blue collar workers just like us, and were happy to see families walking around and children playing in the streets with bubbles and basketballs. Our Escondido community is diverse, filled with other hard working people, always giving a smile, and ready to help when there's a disaster or local issue. For example, a long time, elderly local restaurant owner was unfortunately in a hit and run accident and left in a coma. Our community rallied and brought the family food, necessities, and promoted the local business on all social media platforms to help keep the business up and running. We may be a low income neighborhood, however we happily share what we do have whenever needed. We are proud to live in this city.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). I learned that

DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages

Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families and residents in my community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI equitably addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25% CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, I do not qualify to sign-up for a solar system.

Our income is \$57,000 for a family of 4, and though we are considered low-income in Escondido, we are not qualified based on income under the DAC-SASH program's CARE/FERA income limits that are now in place, instead of 80% AMI.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

Al Gerard R. Lejarde

Address: 533 N. Elm St. Escondido, CA 92025

January 26, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I, Bennie Nelson, write to express my adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

My wife and I have lived in our home in National City, California since April of 1984. We've had solar panels for a little more than two years now and it has made a huge difference in both our household's energy bills and our quality of life. I am a veteran and both my wife and I are retired seniors. We live on a fixed income and having solar has greatly reduced the amount due monthly to SDG&E. We no longer dread turning on the heat when it's cold, fearful that we will be hit with an outrageous and unaffordable bill. We are very appreciative of the work Grid Alternative did and take measures not to exploit or misuse it. We do not have or desire air conditioning.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). I learned that DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages.

Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families and residents in my community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI equitably addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25% CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, I do not qualify to sign-up for a solar system.

I live in National City and based on this location, I do not qualify for the DAC-SASH program as I am outside of the CalEnviroScreen map, but my community is absolutely under-resourced and should be considered disadvantaged for this program.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

Bennie Nelson

4014 Calmoor Street

National City, CA 91950

January 28, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I Jacqueline Jackson write to express my adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

I have lived in the Webster community in the City of San Diego for over 40 years as a child and a homeowner for 30 years. Several of my neighbors share my experience of buying a home on the same street where their parents lived. This is a wonderful safe and nurturing community. We are a working class community. We are proud to be able to afford a home in these difficult economic times.

I have worked in the non-profit arena for 32 years. I am retired. I am a very involved community member and advocate for people who are "differently-abled". I have been and continue to be a member of numerous Cities/Counties/State Advisory Communities and Boards of Directors. I am proud to be a member of the GRID Alternative Family. My solar panels have improved my quality of life providing me with much needed savings and contributing to San Diego's environmental well-being.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). I learned that DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages

Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families and residents in my community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI

equitably addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25% CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, I do not qualify to sign-up for a solar system.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

Jacqueline Jackson

Address: 4967 Date Place, San Diego, CA 92102 **PHONE** 619-263-9433

February 13, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I Janice Meyer write to express my adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

My husband, Charles Meyer and I live in a sub-division in Warner Springs, Ca. We moved from Encinitas in North San Diego County almost 19 years ago. We are retired and the only income we have is our SSA. We are probably the only ones living in our little community that have this low income to qualify for the Grid Alternative Solar. I can't tell you how grateful we are to this solar program. Our weather out here is extreme both in the summer and winter. In the summer when temperatures would soar over 100 degrees, we were fearful to run the air conditioner knowing the utility bills would be more than we could afford. In the winter when temperatures are sometimes below freezing, we mostly warm our home by a wood stove that we burn from early morning till we retire at night. Some mornings when the house is very cold, I will turn on the furnace to take the chill off until the wood stove heats up.

I am so very grateful to Grid Alternatives for there great customer service and giving us the freedom to run our air conditioner to get us through the blistering summers out here in the back country of San Diego.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). I learned that DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages

Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families and residents in my community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI equitably

addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25% CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, I do not qualify to sign-up for a solar system.

- I do have a Grid solar system on my roof at this time.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

Janice E. Meyer

32943 Camino Moro (Mail: PO Box 155)

Warner Springs, Ca 92086

Cell: 760-707-9675

January 14, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

We are writing to express our adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

We are seniors who purchased our home in City Heights, in 1991 with the assistance of a California low income program utilizing 80% of the AMI. 80% of the AMI is important when funding programs in Disadvantaged Communities due to the high cost of housing in San Diego and due to the home-buying criteria used to purchase the housing. These California programs were designed to increase homeownership and increase stability in City Heights which consists of older housing stock which continues to need rehab programs and dramatic energy savings programs such as the Single-family Solar Homes (DAC-SASH) program.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). We learned that DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages

Unfortunately, the current geographic and income parameters of the DAC-SASH program would exclude many families and residents in our community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI equitably addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25% CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, we do not qualify to sign-up for a solar system.

As of October 2019, we were qualified and waiting for solar installation to be completed by year end, which did not happen. Unfortunately, due to the changes in 2020, we no longer qualify based on income under the DAC-SASH programs CARE/FERA income limits that are now in place, instead of 80% AMI.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

Mary Otero & Abraham Gonzalez

3321 42nd St. San Diego, CA. 92105

619 459-6117

January 31, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I, Jeanette Roy, write to express my adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

I am a retired senior on a limited fixed income and affording electricity for my home is challenging. I even limit the use of air conditioning to keep my bill as low as possible. My home is in the Kearny Mesa area of San Diego which is by no means a high-income area but I do not qualify for the DAC-SASH program as I am outside of the CalEnviroScreen map. My community is under-resourced and should be considered disadvantaged for this program. I have been trying to get solar for my home for years to help lower my utility bills and when my income met the SASH requirements I was so excited, only to then have my hopes dashed when I learned that just because I did not live in a specific area of San Diego that I was not eligible.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). I learned that DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages

Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families and residents in my community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI equitably addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25% CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity

for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, I do not qualify to sign-up for a solar system.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

A handwritten signature in blue ink that reads "Jeanette Roy". The signature is fluid and cursive, with the first name "Jeanette" and the last name "Roy" clearly distinguishable.

V. Jeanette Roy

3567 Ames St. San Diego, CA 92111

January 17, 2020

Commissioner Martha Guzman Aceves

California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

Re: Support for GRID Alternatives' Petition for Modification of D.18-06-027 (DAC-SASH program)

Dear Commissioner Guzman Aceves:

I Ambersia Vivar, write to express my adamant support for GRID Alternatives' Petition for Modification of Decision 18-06-027 to expand the geographic and income eligibility for the Disadvantaged Communities Single-family Solar Homes (DAC-SASH) program.

I am a newly separated mother of 3 small children. They attend Darnall Charter school and love being outdoors in the garden with me. I am also an Afghanistan Combat Veteran and served in the Army as a Combat Medic for 5 years. After I got out in 2013 I went on to obtain my Master's Degree in Social Work and now work for the Non-Profit San Ysidro Health.

My community in Rolando Village is an older one with strong values and sense of pride. This is the neighborhood that is lined up with trick or treaters for 2 hours straight. The neighbor's value cleaning up after their dogs as well as helping as a team to catch the dogs that will occasionally run out the front door.

Decision 18-06-027 established the DAC-SASH program which aims to increase access to solar technology for low-income homeowners in disadvantaged communities (DACs). I learned that DAC-SASH can also be paired with energy storage systems, creating more opportunity for households like mine to increase resilience and get access to complementary technologies with broad benefits, especially during power outages

Unfortunately, the current geographic and income parameters of the DAC-SASH program exclude many families and residents in my community who have high energy burdens and would benefit greatly from the program.

The DAC-SASH program's current income limit unfairly excludes households living in high cost-of-living areas in the state, so I support GRID's effort to expand the program by changing the income eligibility to 80% AMI from 200% of the Federal Poverty Limit (FPL). 80% AMI equitably addresses the varied cost-of-living in California, qualifying more low-income households living in disadvantaged communities in the Bay Area, Los Angeles, and San Diego.

GRID's petition also seeks to expand the geographic eligibility of the program beyond the CalEnviroScreen map, allowing homeowners in urban areas and high fire districts to participate, among other parts of the state that are currently excluded. Allowing only the top 25%

CalEnviroScreen census tracts statewide is too narrow and does not allow sufficient opportunity for disadvantaged communities like mine to participate in DAC-SASH. Under the DAC-SASH program, I do not qualify to sign-up for a solar system.

I do not have a Grid solar system on my roof at this time. I live in Rolando Village, San Diego 92115, I do not qualify for the DAC-SASH program as I am outside of the CalEnviroScreen map, but my community is under-resourced and should be considered disadvantaged for this program.

In the face of California's housing crisis, urban displacement, power shutoffs, wildfires, and climate change, low-income families living in DACs in my community should not be excluded from DAC-SASH. They should be allowed to participate and pursue resiliency, local power, and the economic and community benefits that rooftop solar creates.

I strongly support GRID's effort to expand this program and I appreciate your leadership to ensure equitable access to solar energy within the DAC-SASH program. Thank you for your time.

Sincerely,

Amberosia Vivar

Address: San Diego, Ca, 92115, 619-227-5498